I.1

Region V Safety Plan Waiver

MEMORANDUM

Date: 8-31-92

To: File

From: A. Buski

Subj: Safety Plan Tracking
TDD # T05-9201-038

An original safety plan for TDD # T05-9201-038 was not submitted by the Project Manager or project Site Safety officer for the following reason(s):

The site safety plan utilized during the site assessment of the same plan that was utilized (T05-9201-037)

Anne A. Buski
Signature

cc: E & E Health and Safety Group

Region V Safety Plan Waiver

MEMORANDUM

Date: 7/23/92

To: File

From: Peter Lee

Subj: Safety Plan Tracking
TDD # 705-9206-001

An original safety plan for TDD # 705-9206-001 was not submitted by the Project Manager or project Site Safety officer for the following reason(s):

Peter Lee
Signature

cc: E & E Health and Safety Group

SEE REFERENCE SHEET

SITE NAME: Alside Inc.

STATE: OH

DOCUMENT DESCRIPTION: Site Assessment

DATE: 4/10/92

ATTACHED TO:

DOCUMENT DESCRIPTION: _____

DATE: _____

ALPHABETICAL SUBSECTION: I.

LOCATION OF DOCUMENT:

_____ FILE FOLDER

__✓__ ACCORDION FOLDER

_____ CBI ROOM

_____ MAP CABINET DESIGNATED _____

File

ecology and environment, inc.
6777 ENGLE ROAD, CLEVELAND, OHIO 44130, TEL. (216) 243-3330
International Specialists in the Environment

Date: March 6, 1992

To: Duane Heaton, DPO
EPA Region V, Emergency Support Section

Thru: Thomas Kouris, TATL
Region V, Technical Assistance Team

From: Anne A. Busher, ATATL AAB
Region V, Technical Assistance Team

Subj: SPCC Inspection of the Alside, Inc.
Akron, Summit county, Ohio
TDD# T05-9201-038
PAN# EOH0952CAA

CC: Ross Powers, OSC
EPA Region V, Emergency Support Section

On February 10, 1992 the Technical Assistance Team (TAT) was tasked to complete an SPCC Inspection at the Alside, Inc. facility located in Northampton, Summit County, Ohio. The Facility Manager, Mr. John Shaner, informed the TAT and OSC that no oil was stored on site in tanks. Mr. Shaner also told TAT and the OSC that they did not have an SPCC plan for the facility, and therefore there was no plan to review. TAT has completed the SPCC Field Inspection Report and has submitted it to OSC Mr. Ross Powers.

B. SPCC INSPECTION SUMMARY SHEET

SPCC NO.	CASE NO.	DATE OF INSPECTION 2 - 10 - 1992
NAME OF INSPECTOR (signature) Anne A. Busher		DATE OF DOCUMENTATION REPORT 3 - 6 - 1992
NAME OF INSPECTOR (print) Anne Busher, Region V TAT; also Ross Powers OSC and Nazeer Uddin, TAT		NPDES NO.

1. FACILITY

a. COMPANY
Alside, Inc.

ADDRESS		TELEPHONE
3773 Akron-Cleveland Road		(216) 929-1811
CITY Akron	STATE Ohio	ZIP CODE 44309

FACILITY NAME
Same

b. FACILITY LOCATION
See Above Addess

PARENT CORPORATION
Not Available

ADDRESS

CITY	STATE	ZIP CODE

c. WATER BODY PROTECTED
Not applicable

2. PURPOSE

INITIATION: [X] Routine Surveillance [ ] Coast Guard Information
[ ] Spill Report [ ] Citizen Information [ ] Other (specify):

TYPE: [X] Plan Preparation [ ] Plan Implementation
[ ] Follow-up [ ] Plan Amendment

3. INSPECTION

INDIVIDUAL CONTACTED John Shaner	TITLE Facility Manager
INDIVIDUAL CONTACTED Dave Mattern	TITLE Environmental Director
NOTIFICATION	

B. SPCC INSPECTION SUMMARY SHEET (page 2 of 2)

4. FINDINGS

SOURCE IN APPARENT COMPLIANCE WITH SPCC REQUIREMENTS:

[X] Yes
- [ ] Have adequate plan
- [X] Not subject to regulations
  - [X] Insufficient storage
  - [ ] No reasonable spill expectation
- [ ] Plan fully implemented
- [ ] New facility operational for less than 6 months

[ ] No
- [ ] No plan
- [ ] Plan not properly certified
- [ ] Plan does not have management approval
- [ ] Plan not maintained at facility manned 8 hrs/day
- [ ] Inadequate plan (detailed SPCC Plan review attached)
- [ ] Plan not fully implemented
- [ ] Plan not reviewed within 3 years

[X] Other
Company Manager told inspectors that the facility does not presently have any oil stored in tanks.

5. ATTACHMENTS
(None required if facility is in apparent compliance)

	NONE	ATTACHED	ALREADY ON FILE
*Detailed Observations	[X]	[ ]	[ ]
*Photographs	[X]	[ ]	[ ]
Slides	[X]	[ ]	[ ]
Map	[X]	[ ]	[ ]
*Field Drawing	[X]	[ ]	[ ]
*Comments	[ ]	[X]	[ ]
Telephone Conversations	[ ]	[X]	[ ]
*SPCC Plan	[X]	[ ]	[ ]

*(ALL REQUIRED IF FACILITY IS NOT IN APPARENT COMPLIANCE. If photos not permitted, check "None" and explain. Add "SPCC Plan" to List of Attachments when appropriate.)

A. SPCC FIELD SHEET
(To be completed if SPCC Regulation is applicable to Facility - See 40 CFR 112.1)

1a. NAME OF FACILITY Alside, Inc.	**1b. TYPE OF FACILITY** Aluminum & steel siding
1c. FACILITY LOCATION 3773 Akron-Cleveland Road, Akron, Ohio 44309	
2a. NAME OF OWNER AND/OR OPERATOR RESPONSIBLE FOR FACILITY John Shaner - Facility Manager	**2b. TELEPHONE NUMBER** (216) 929-1811
2c. MAILING ADDRESS P.O. Box 2010, Akron, Ohio 44309	
3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE None.	
4. IS A CERTIFIED SPCC PLAN AVAILABLE FOR INSPECTION? [ ] YES [X] NO	**5. DATE OF INSPECTION** February 10,1992
6. NAME AND REGISTRATION NUMBER OF CERTIFYING ENGINEER [X] NOT AVAILABLE	**7. DATE SPCC PLAN WAS CERTIFIED** [X] NOT AVAILABLE
8. IS THE SPCC PLAN FULLY IMPLEMENTED? [ ] YES [ ] NO [X] NOT APPLICABLE	
9. NAME OF WATER BODY THAT POTENTIAL SPILL COULD ENTER: OR IF UNNAMED TRIBUTARY, THEN FIRST WATERBODY DOWNSTREAM *Not Applicable. No oil is presently stored at this address.*	
10. COMMENTS Mr. Shaner, representative for the Alside, Inc., told inspectors and OSC Ross Powers that at the present time the facility has no oil storage. All tanks at the facility which at one time stored oil were presently out of service or had been removed from the premises.	

11a. SPCC NO. T05-9201-038	**11b. CASE NO.**	**11c. NPDES NO.** [X] NOT AVAILABLE
12a. INSPECTOR (sign) Anne A. Busher		**12b. DATE** 3 - 6 - 1992
12c. INSPECTOR (print) Anne A. Busher		

A. SPCC FIELD SHEET (attachment 1)
3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE

No oil of any type is stored at this facility.

A. SPCC FIELD SHEET (attachment 1)
10. COMMENTS

Not applicable. No oil is stored at this facility.

C. DETAILED SPCC DOCUMENTATION

FACILITY	DATE OF INSPECTION
Alside, Inc.	2 - 10 - 1992

1. FACILITY DESCRIPTION

1a. TYPE OF BUSINESS/OPERATION
Aluminum & steel siding manufacturer

1b. FACILITY OIL STORAGE

No oil storage at this facility

1c. PREVENTION MEASURES PROVIDED

Not applicable.

1d. APPEARANCE OF FACILITY (housekeeping)

Not applicable.

1e. PAST SPILL HISTORY

Unknown.

C. DETAILED SPCC DOCUMENTATION

2. RECEIVING WATER (should spill occur)

2a. NAME AND/OR DESCRIPTION

Not applicable.

[ ] Perennial [ ] Intermittent
[ ] Water present at time of inspection
[ ] Inspector traced discharge to receiving water
[ ] Inspector traced apparent drainage path to receiving water
[ ] Receiving water identified by company representative
[ ] Receiving water identified from topo map
[ ] Receiving water identified by other means (specify):

2b. PROBABLE FLOW PATH TO RECEIVING WATER

2c. CLIMATIC INFORMATION

C. DETAILED SPCC DOCUMENTATION

3. COMMENTS

4. SPCC PLAN REVIEW

5. SPCC AMENDMENT RECOMMENDATIONS (AMENDMENT INSPECTIONS ONLY)

C. DETAILED SPCC DOCUMENTATION

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow of other orientation)

FACILITY	INSPECTION DATE
INSPECTOR	

C. DETAILED SPCC DOCUMENTATION

7. PHOTOGRAPHS (Attach more sheets if needed)					
SUBJECT					
FACILITY					
PHOTOGRAPHER				WITNESSES	
DATE	TIME	DIRECTION	CAMERA	FILM	ATTACHMENTS

I-1

ECOLOGY AND ENVIRONMENT, INC.

CLEVELAND OFFICE

SITE SAFETY PLAN RECORD

Site Name: Alsid, Inc

PAN Number: E04052VAA

TDD Number: T05-9206-001

Lead TAT: Peter Lisi

OSC Name / Office: Ross Power

Type of Safety Plan Prepared: _____ Long Form

_____ Short Form

__X__ Not Required

DATES:

Original sent to Chicago TAT Office: _____

Injury Report Sent to Chicago: _____ if applicable

TYPES OF ACTIVITY

Emergency Response _____ Site Assessment _____

Removal Activities _____ SPCC Inspection _____

Sampling _____

Chemical Safety Audit _____ TAT/EPA Training _____

Oil Spills/311 _____ Haz- Cat _____

Other _____

Last Update: _____ Reviewed By _____

I.1

ECOLOGY AND ENVIRONMENT, INC.

CLEVELAND OFFICE

SITE SAFETY PLAN RECORD

Site Name: Alside Inc.

PAN Number: EOH 0953CAA

TDD Number: TO5-9201-038

Lead TAT: A. Busker

OSC Name / Office: R. Powers / Grosse Ile

Type of Safety Plan Prepared: _____ Long Form

from site assmt report. ✓ Short Form

_____ Not Required

DATES:

Original sent to Chicago TAT Office: _____

Injury Report Sent to Chicago: _____ if applicable

TYPES OF ACTIVITY

Emergency Response _____ Site Assessment _____

Removal Activities _____ SPCC Inspection ✓

Sampling _____

Chemical Safety Audit _____ TAT/EPA Training _____

Oil Spills/311 _____ Haz- Cat _____

Other _____

Last Update: _____ Reviewed By _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
MEMORANDUM

Date: January 28, 1992

From: Rita Cestaric, Project Manager RC
Ohio/Minnesota Section
RCRA Enforcement

To: Ross Powers, Chief
Response Section I
Emergency Response Branch

RE: Alside Division of Associated Materials
Northampton Township, Ohio

Attached is some information from my file concerning the Alside Division of Associated Materials, Northampton Township, Ohio. As we discussed last Friday, I hope to have the administrative work completed so that we can perform an inspection of the facility during the second week of February. I am proposing that the inspection include collecting soil, sediment and surface water samples.

I will contact you by the end of this week to finalize the schedule. If you have any questions, please contact me at (312) 353-6500. I look forward to working with you and your staff and appreciate your involvement in this case.

Enclosures

ECOLOGY AND ENVIRONMENT, INC.

CLEVELAND OFFICE

SITE SAFETY PLAN RECORD

Site Name: Alside, Inc.

PAN Number: EOH0952SAA

TDD Number: TOS-9201-037

Lead TAT: N. Uddin

OSC Name / Office: Ross Powers / Grosse Ile

Type of Safety Plan Prepared: _____ Long Form

X Short Form

_____ Not Required

DATES:

Original sent to Chicago TAT Office: ✓

Injury Report Sent to Chicago: _____ if applicable

TYPES OF ACTIVITY

Emergency Response _____ Site Assessment ✓

Removal Activities _____ SPCC Inspection _____

Sampling _____

Chemical Safety Audit _____ TAT/EPA Training _____

Oil Spills/311 _____ Haz- Cat _____

Other _____

Last Update: _____ Reviewed By _____

ALSIDE, INC
SITE ASSESSMENT
T05-9201-037

The Alside, Inc. site is a former aluminum and steel siding coating manufacturing facility, located in Northampton Township, Ohio. The TAT was tasked this reporting period to implement a health and safety plan, compile available background information, conduct a site inspection to evaluate the potential threat to human health and the environment, prepare a site sampling plan, and document and photodocument on-site activities.

The TAT was responsive to the sensitive nature of the site during the preparation of an in-depth sampling plan for the site. A high level of detail regarding equipment decontamination procedures and sample quality control was outlined and followed to during on-site sampling. The TAT's use of available personnel resources minimized costs to the Agency, maximizing the overall work quality. The TAT worked to maintain the schedule of work during adverse weather conditions. The TAT worked closely and quickly with Agency personnel in order to prepare strategies and maximize productivity of on-site time during the site assessment and sampling. The TAT assisted in organizing and compiling information obtained by TAT and Agency personnel during the site assessment, which assisted in the identification of some areas of concern. The TAT worked very closely with the procured analytical laboratory to ensure a high quality deliverable.

The draft report was of a high quality requiring few changes by the OSC. The project is presently on schedule an deadlines are projected to be met. The TAT has remained extremely responsive to the OSC's needs and concerns throughout this project.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

DATE: AUGUST 9, 1991

SUBJECT: ALSIDE INC., SUBSIDIARY OF US STEEL

FROM: JEANNE GRIFFIN
OH SITE ASSESSMENT MANAGER

TO: ROSS POWERS, CHIEF
RESPONSE SECTION I

ATTACHED PLEASE FIND A COPY OF A SCREENING SITE INSPECTION FOR THE ABOVE REFERENCED SITE. DUE TO THE POSSIBLE DIRECT CONTACT, THE OEPA HAS REQUESTED THAT THE SITE BE FENCED. PLEASE REVIEW REPORT AND LET ME KNOW IF THE SITE QUALIFIES FOR IMMEDIATE FENCING. FURTHER INFORMATION MAY BE OBTAINED FROM ROBERT KRUZEJA OF ECOLOGY AND ENVIRONMENT, INC. AT 312/663-9415.

ATTACHMENT

ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415

International Specialists in the Environment

August 31, 1990

Mr. Jim Bussman
Alside, Inc.
P.O. Box 2010
Akron, OH 44309

Re: Site Name: Alside Inc.
TDD No.: F05-8912-001
PAN: F0H0292SB
U.S. EPA No.: OHD004163549

Dear Mr. Bussman:

This letter is in response to your recent inquiry requesting additional information concerning our firm. Ecology and Environment, Inc., has been retained by the U.S. Environmental Protection Agency (U.S. EPA) under contract 68-01-7347 for the purpose of evaluating candidate sites for the National Priorities List under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA).

Information supplied to the U.S. EPA through CERCLA notifications as required by Section 103(c) of CERCLA has identified the property in question as a possible candidate for the National Priorities List. As part of our evaluation, the U.S. EPA has asked us to perform an on-site inspection of the property in question. This is the reason for my request to visit your facility on October 22 at 8:00 a.m.

I have attached a copy of the Letter of Introduction provided by the U.S. EPA for Ecology and Environment, Inc., employees engaged in field investigation work, which outlines the statutory basis for such inspections. Also enclosed is a copy of Section 104(e) of CERCLA, outlining the authority of Ecology & Environment, Inc., to conduct inspections for the U.S. EPA, taken from Environment Reporter, published by the Bureau of National Affairs, Inc., Washington, D.C. 20037, February 24, 1989, 71:0710-0712. So you have a better understanding of the questions we need to ask, I have also attached a copy of the site inspection form.

Because of the U.S. EPA efforts to support state requirements, please be advised that pursuant to Ohio Revised Code Section 3734.02(H) and Ohio Administrative Code 3745-27-13, U.S. EPA has submitted a request for the authorization of the Director of the Ohio Environmental Protection Agency (OEPA) to perform this intrusive sampling at your facility. Ohio Administrative Code 3745-27-13(c)(4) requires U.S. EPA to provide OEPA with acknowledgment of notice to the property owner. I have enclosed a second copy of this letter and a stamped self-addressed return envelope.

August 31, 1990

Please acknowledge receipt of this letter by signing the second copy and returning the signed letter in the enclosed envelope. If U.S. EPA does not receive acknowledgment within 10 days after your receipt of this letter sent via certified mail, the return receipt will be deemed constructive acknowledgment of this notice.

If you require additional information, please do not hesitate to call me.

Sincerely,

Jeff Taylor

Jeff Taylor
Enclosures

Acknowledgment of Notice

Owner/Operator
Executive Vice President-Corporate Services

September 7, 1990
Date

SEP 10 1990

P 352 448 531

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Jim Bussman	
Street and No. PO Box 2010 Alside Inc	
P.O., State and ZIP Code Akron OH 44309	
Postage	$ 1.25
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 3.00
Postmark or Date	CHICAGO LOOP STA SEP 5 1990 USPO

PS Form 3800, June 1985

*U.S.G.P.O. 1989-234-555

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:

Mr Jim Bussman
Alside Inc.
P.O. Box 2010
Akron, OH 44309

4. Article Number
P 352 448 531

Type of Service:
- ☐ Registered
- ☐ Insured
- ☒ Certified
- ☐ COD
- ☐ Express Mail
- ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X Alside

6. Signature — Agent
X Jim Bussman

7. Date of Delivery
9-7-90

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Apr. 1989 ★U.S.G.P.O. 1989-238-815 **DOMESTIC RETURN RECEIPT**

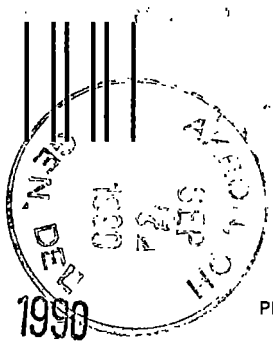
UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Jeff Taylor % Ecology + Environment

111 W. Jackson Blvd 12th FLR

Chicago, IL 60604

OhioEPA

March 7, 1983

Mr. James Allen, Attorney
Squire, Sanders and Dempsey
BancOhio National Plaza
155 East Broad Street
Columbus, Ohio 43215

Re: Alside, Inc. Past Waste Disposal Practices, Hydrogeologic Assessment

Dear Mr. Allen:

I am writing to you at this time to express the Ohio EPA's concern with the hydrogeologic assessment currently being conducted at the Alside, Inc. facility.

It is my understanding that while Alside is proceeding with a groundwater monitoring program, the hydrogeologic report supporting well placement, parameter selection and sample methods has, as of this date, not yet been submitted to Ohio EPA's Northeast District Office for review and comments. Further, it is my understanding that sampling has already begun.

The danger in pursuing such a course of action is of course that the Ohio EPA will not agree with the conclusions drawn from the preliminary hydrogeologic report. Such disagreement will naturally cast doubts over the validity of any results obtained. Additionally, as the sampling program has not been approved by the Ohio EPA, we are not participating in sampling nor obtaining sample splits. Again, I am concerned that this may cast doubt over any results obtained.

In conclusion, I strongly urge you to provide a copy of the hydrogeologic information requested to Debbie Berg, DHMM, Northeast District Office. I believe this will enable both parties to most expeditiously achieve our mutual goals. I believe this will also help eliminate the need for additional monitoring or hydrogeologic assessments should disagreements arise in the future regarding work Alside is currently doing.

Sincerely,

Charles J. Wilhelm, Chief
Div. of Hazardous Materials Management

CJW/vjw

cc: Alan Lapp
Steve White
Rich Shank
Debbie Berg

Summit Co. (3

NOV 2 4 1981

Mr. Bill Bush
Wastewater Section
Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

RE: Alside, Inc.
Cuyahoga Falls, Ohio

Dear Bill:

Pursuant to our November 18, 1981, phone conversation, I am forwarding a portion of a survey report and sample results from a June 10, 1981, inspection of the above-referenced facility.

Although the inspection was performed under RCRA authority, evidence of possible Clean Water Act violations was obtained, i.e. unauthorized discharges. Sample results from the receiving stream below one of these discharges indicate the presence of several organic contaminants, e.g. ethylbenzene, toulene. I believe these compounds are associated with the solvents used by Alside and should not be present in the stream if the company were only discharging non-contact cooling water.

I would like to coordinate with you in addressing surface water problems at the site after you get a chance to read the report. I have also touched base with Debby Berg as well as Mike Shapiro of the Facilities Approval Board regarding the hazardous waste problems at Alside.

If you have any questions regarding the report, please call me at (312) 886-6765.

Very truly yours,

/s/

Joel E. Balmat
Environmental Scientist

Enclosure

cc: Steve White, Assistant Chief
Office of Hazardous Materials
Management

Bill Skowronski, Ohio EPA
Northeast District Office

Debby Berg, Ohio EPA
Northeast District Office

ecology and environment, inc.
223 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60606, TEL. 312-663-9415
International Specialists in the Environmental Sciences

DATE: June 19, 1981

TO: File

FROM: Paul Hess

SUBJECT: Ohio/TDD# F5-8104-03
Northhamton Township/Alside, Inc.
E&E No. OH292

On April 29, 1981 while attempting to inspect the above facility, writer was informed by Mr. Larry Cochran, Director of Manufacturing, that all investigative inquiries by government agencies must be coordinated through their company attorney, Mr. James Allen, (216) 696-9200. Therefore, writer conducted an off-site investigation of said facility at that time. Dan Sewall took thirteen (13) pictures of the facilities foreground while walking its' perimeter (see attached pictures, exhibit A).

After a number of conversations with Mr. Allen and subsequent calls by him to the Chicago regional office of the United States EPA, writer was requested by Mr. Allen to submit in writing documents supporting author's authority and liability under federal law, along with reason for and extent of pending inspection of Alside Inc. (see attached letter exhibit B). On May 30, 1981, writer received written confirmation on an inspection dated along with Mr. Allen's conditions of inspection, (see attached letter exhibit C). A copy of this letter was submitted to and approved by Ms. Kate Buttolph, United States EPA, Enforcement attorney assigned to this case.

On June 10, 1981, writer assisted by Melinda Becker, Ohio EPA, (NEDO), Cyndi Bachunas, Bob Wachsmuth and Ann Weaver, all Ecology and Environment, Inc. FIT members, conducted an "Uncontrolled Hazardous Waste Site" and "Interim Status Standards" inspection at said facility. The inspecting team interviewed Mr. Larry Cochran, Director of Manufacturing of Alside, Inc., Mr. James Allen, Attorney for said company, and Mr. Frank Boinski, Environment Engineer and consultant for United State Steel Corp., parent company of Alside, Inc.

The first obstacle of our interview was Alsides' conditions of entry. Mr. Allen, after accepting our letters of introduction, wanted each member of the inspecting team to sign their "Confidentiality and Waiver of Liability" form. Writer explained both the United States EPA and E&E's policy with respect to such forms. Mr. Allen, then waived this requirement. Next, both parties reviewed each point outlined in Mr. Allen's letter May 30, 1981 as it related to the physical inspection as set forth in writer's letter of May 13, 1981.

would take their material. He felt that the price of landfill internment was also a factor. He did not know which drums of paint sludge were hazardous waste and which drums were not. He knew that some paint pigment waste is hazardous, but could not afford to privately test each drum. He did admit that they have done some private testing of their waste, but it was costly. Alside's sales were down 25 to 30 percent this year due largely to the drop in housing starts nation wide, and the high interest rates in the remodeling field.

Cyndi Bachunas conducted the "Interim Status Standards" interview with Mr. Cochran, (see TSD form and the memo attached, exhibit F). Based on the information obtained during this interview, Alside, Inc. does not warrant interim status at this time because of violation of several statuts under RCRA.

Robert Wachsmuth and writer toured the entire rear of the plant which included there points of interest. They are the secured drummed waste storage area, the discontinued settling ponds area, the field-surface water discharge points, the NPDES discharge point, the swampy receiving water area (creek), and the landfill area.

The drum storage area contained far too many drums to count. This area was separated into three (3) sub-areas. They are drums of old paint sludge, drums of new paint sludge, and drums of spent paint solvent. There were about 300 drums in the spent paint solvent sub-area as opposed to the 30 drums claimed by Mr. Cochran. Some of these drums were empty, but far too many drums contained material. A hazardous waste sample was taken form one drum of each sub-area, (see sampling sketch and pictures attached exhibit G & H). The condition of the drums ranged from very good to poor. The house-keeping of this area was very poor. There was no order to the storage area as some drums were on their sides, others on end, some were on old pallets, others on the ground and some drums were half buried in the wet soil; although most of of the drums were closed, yet others were open. The soil (clay) around the drum storage area had been recently graded by bulldozers (two) working in the rear of the plant, and the soil was very wet from rain the day before. There was little evidence of waste spillage on the soil in the area that had been graded. However, there were small spill areas visible between the drums. No soil samples were taken of these spill areas, because of limited number of sample bottles and the lack of a major spill area. It should be noted that this drum storage area was secured by either a six (6) foot high cyclone fence or the plant building. The entrance to this storage area was manned by security guards on duty, 24 hours per day, seven days per week.

The settling pond, containing chromate sludge, was being closed with clay-fill by the two bulldozers working at the rear of the plant. They had graded most of this area, and were removing fill from the front of the plant. No samples were taken as previously discussed.

There were three (3) surface-water drainage fields built into the high ground under the drum storage area, the landfill area, and the settling pond area. Rain water saturating the top soil, works its way into these fields and is discharged into the lower wet lands, (swampy creek), through a 1.5 foot diameter clay tile. Any chemical spills would also follow this path and be carried with the water. None of these point discharges were sampled directly. However, the receiving water at the middle discharge was sampled along with the sampling of the NPDES point discharge (non-contact process cooling water). The NPDES point discharge is two (2) feet north of the middle discharge point. The odor emitted at this sample point was similar to that of paint solvent, and a large oily film was noted on the water surface of the creek near the two discharge points. Also, noted in the wetland area, were four (4) partially buried drums. One was next to the NPDES discharge, two (2) were in the swampy area about 30 feet south of the NPDES discharge, and one was west about halfway between NPDES discharge and the fence line at the rear of the plant. Some paint sludge was observed in one of the partially buried drums along with water. It should be noted here, that Mr. Boinski rejected one set of pictures of the receiving water sampling point because the oily film as mentioned was visible in the picture.

The landfill area was not well defined, because of the grading mentioned above, and the fact that much debris was visible throughout the top soil at the rear of the plant. The drum storage area also covered much of this landfill area.

Mr. Clarence Bieze, FIT member of Ecology and Environment Inc., has prepared a literature-based hydrogeological profile of this site, (see attached Hydrogeological of Alside Inc. Area, exhibit I).

In light of the above, writer recommends that the following action be taken. The United States EPA should advise Alside Inc., in writing as to the specific deficiencies that exist at this site with respect to their noncompliance with the provisions of the Clean Water Act and RCRA. A suitable grace period should be granted subject company to amend their internal system and practices in order to comply with the above federal acts. At the end of this grace period, another full field inspection should be conducted along with a full sampling program to determine the degree of compliants achieved.

The United States EPA should recommend or assist subject company in locating a suitable secured landfill or alternate method for disposal of the drummed hazardous waste. Alside Inc., should develop an alternate waste collection and separation system for its mixed paint sludge and spent slovent waste which will eliminate contamination of the soil and surface/receiving water. A soil boring survey as well as a well monitoring system should be under taken by subject company after the drums have been removed, additionally a two (2) foot clay cap with suitable cover such as vegetation, or phalt should be placed over the landfill area in order to insure the containiment of all hazardous waste buried on-site. The monitoring wells and surface water discharge points should then be periodicaly checked by Ohio EPA.

This is a preliminary evaluation, and further recommendation may be forthcoming after obtaining laboratory results from samples taken at this site.

EXHIBIT A

Date: 4-29-81

Time: 9:55 (A.M.) P.M.

Photograph By:

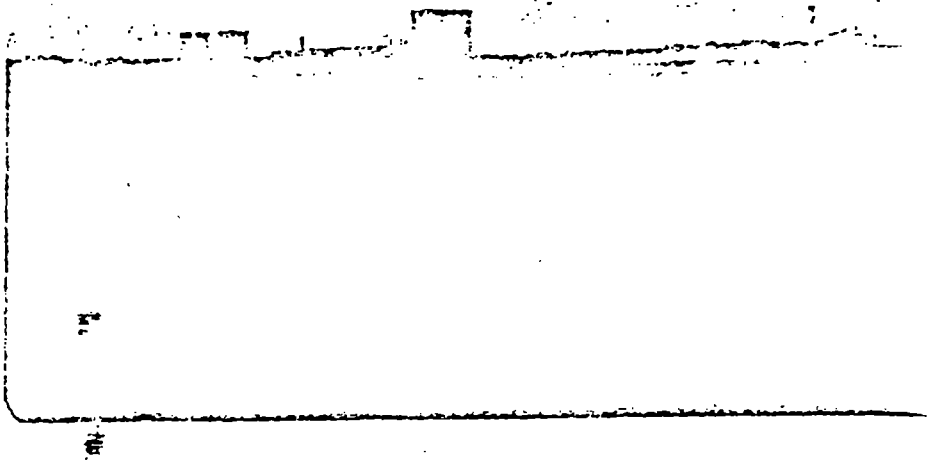
DAN SEWALL

TDD# F5-8104-03

State- OHIO

CUYAHOGA FALLS, ALSIDE, INC.

Comments: Photograph taken toward the SOUTHEAST - SHOWING ALSIDE'S NORTH BOUNDARY AND GO-JO BUILDING



Date: 4-29-81

Time: 9:56 (A.M.) P.M.

Photograph By:

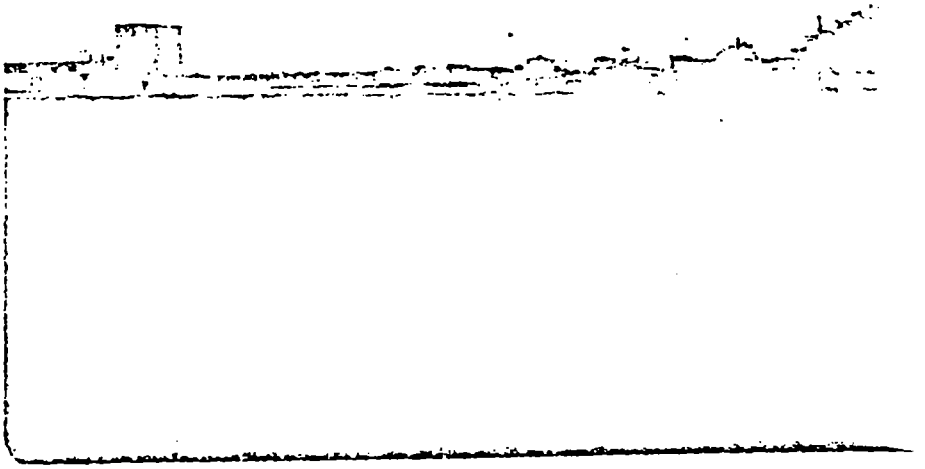
DAN SEWALL

TDD# F5-8104-03

State- OHIO

CUYAHOGA FALLS, ALSIDE, INC.

Comments: Photograph taken toward the SOUTHEAST - SHOWING ALSIDE'S NORTH BOUNDARY AND EXHAUST STACKS



Date: 6-10-81

Time: 4:50 A.M. (P.M.)

Photograph By: (U.S.S. EMPLOYEE)

FRANK BOINSKI

TDD# ES-8104-03

State- OHIO

CUYAHOGA FALLS ALLSIDE, INC.

Comments: Photograph taken

toward the EAST

#5 SAMPLE OF

RECEIVING WATER

Date: _____

Time: _____ A.M. P.M.

Photograph By:

_____

TDD# _____

State- _____

_____ 1 _____

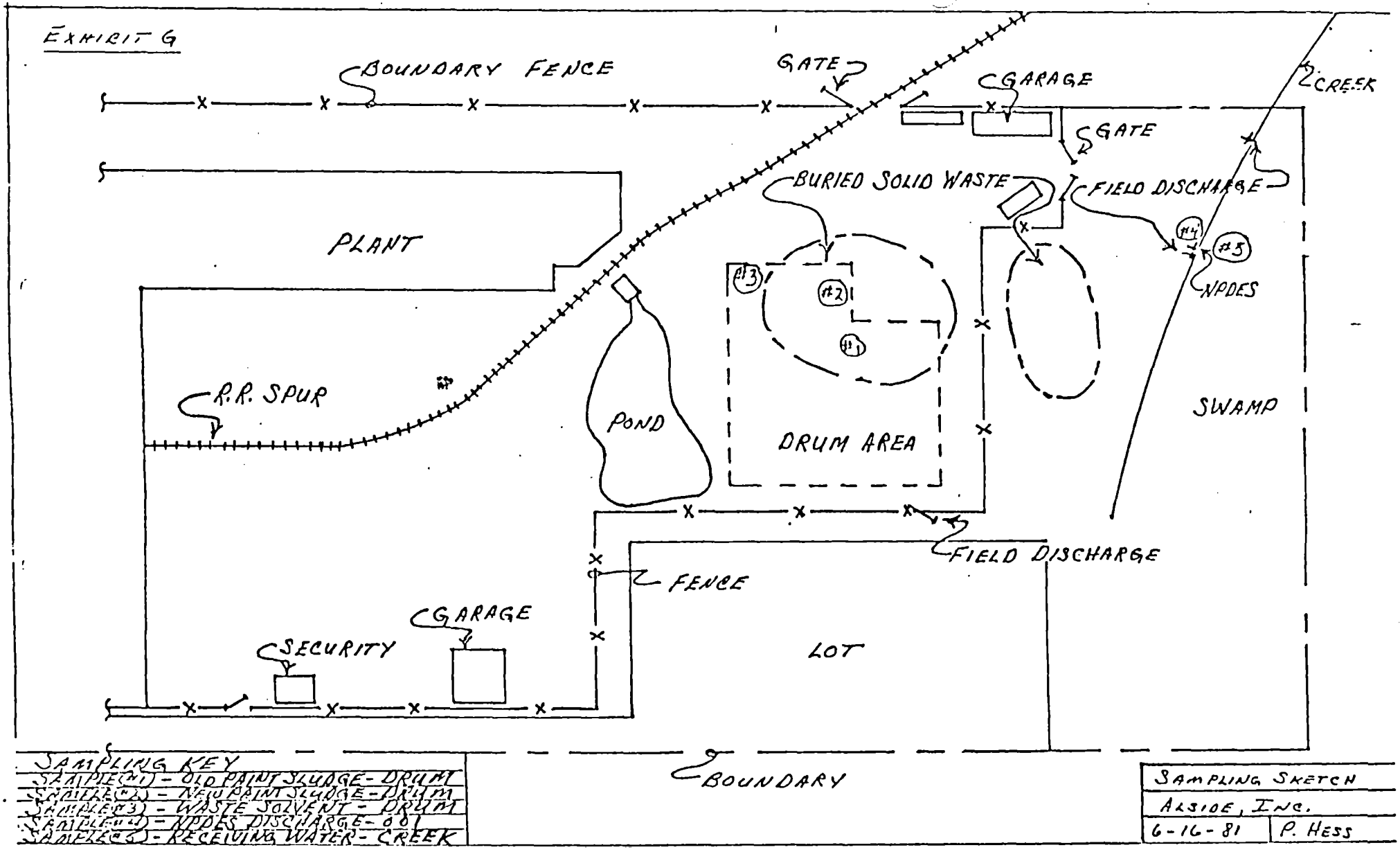
Comments: Photograph taken

toward the _____

_____

_____

EXHIBIT G



SAMPLING KEY
SAMPLE(#1) - OLD PAINT SLUDGE - DRUM
SAMPLE(#2) - NEW PAINT SLUDGE - DRUM
SAMPLE(#3) - WASTE SOLVENT - DRUM
SAMPLE(#4) - NPDES DISCHARGE - 001
SAMPLE(#5) - RECEIVING WATER - CREEK

SAMPLING SKETCH
ALSIDE, INC.
6-16-81 | P. HESS

LABORATORY NAME Sverdrup Technology, Inc.

LAB SAMPLE ID NO. C1161, C1162

QC REPORT NO. Sverdrup 10

	VOLATILES	ug/l
:V	acrolein	ND
5V	acrylonitrile	
V	benzene	
7V	carbon tetrachloride	
V	chlorobenzene	
C	1,2-dichloroethane	
1V	1,1,1-trichloroethane	
3V	1,1-dichloroethane	
4V	1,1,2-trichloroethane	
5V	1,1,2,2-tetrachloroethane	
6V	chloroethane	
9V	2-chloroethylvinyl ether	
3V	chloroform	46
9V	1,1-dichloroethylene	ND
0V	1,2-trans-dichloroethylene	
	1,2-dichloropropane	
3V	1,3-dichloropropylene	
8V	ethylbenzene	*
2V	methylene chloride	ND
5V	methyl chloride	
3V	methyl bromide	
2V	bromoform	
:V	dichlorobromomethane	*
4V	trichlorofluoromethane	ND
2V	dichlorodifluoromethane	
V	chlorodibromomethane	
V	tetrachloroethylene	
V	toluene	*
V	trichloroethylene	ND
V	vinyl chloride	

	PESTICIDES
89P	aldrin
90P	dieldrin
91P	chlordane
92P	4,4'-DDT
93P	4,4'-DDE
94P	4,4'-DDD
95P	-endosulfan
96P	-endosulfan
97P	endosulfan sulfate
98P	endrin
99P	endrin aldehyde
100P	heptachlor
101P	heptachlor epoxide
102P	-BHC
103P	-BHC
104P	-BHC
105P	-BHC
106P	PCB-1242
107P	PCB-1254
108P	PCB-1221
109P	PCB-1232
110P	PCB-1248
111P	PCB-1260
112P	PCB-1016
113P	toxaphene

	DIOXINS
129B	2,3,7,8-tetrachlorodibenzo-p-dioxin

*Less than 10 ug/l
(pesticides less than 5 ug/l)

QC Report No: Sverdrup 10 | E0351

A. SURROGATE SPIKE RESULTS

COMPOUND	Fraction	Conc. (ug/l)	(Surrogates only) Spike Added (ug/l)	% Recov
Bromochloromethane	VOA	82	80	103
1,4 - Dichlorobutane	VOA	83	80	104
2 - Fluorophenol	Acid	63	163	39
D5 - Phenol	Acid	57	160	36
D5 - Nitrobenzene	Base/Neut	147	164	90
2 - Fluorobiphenyl	Base/Neut	151	160	94
D8 - Naphthalene	Base/Neut	97	101	96

B. TENTATIVELY IDENTIFIED COMPOUNDS

	CAS #	COMPOUND NAME	Fraction	% Maximum Score Attained Mass Matching Routine: Purity Maximum 100 (specify)
1.	55334-40-2	Benzeneacetic acid, .alpha.,	BN	Purity Fit 33 51
2.		4-Bis/(Trimethylsilyl) oxy/-,		
3.		Methyl Ester		
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				

Sample #4 Organic 001

ENVIRONMENTAL PROTECTION AGENCY - HWI Sample Management Office
P.O. Box 818 - Alexandria, Virginia 22313 - 703/ 557-2490/FTS-8-557-2490

FOS-8104

Metals

Cyanide

INORGANICS ANALYSIS DATA SHEET

585-152

EPA 9010

LABORATORY NAME Versar Inc. SAMPLE NO. ME 8285

LAB SAMPLE ID NO. 4375, 4379 QC REPORT NO. [illegible]

TASK 1 (Elements to be identified and measured)

		ug/l			ug/l
1.	Aluminum	1,000.	10.	Nickel	<20.
2.	Chromium	<10.	11.	Manganese	60.
3.	Barium	30.	12.	Zinc	830.
4.	Beryllium	<2.	13.	Boron	40.
5.	Cadmium	<5.	14.	Vanadium	<10.
6.	Cobalt	<10.	15.	Calcium	60,600.
7.	Copper	<20.	16.	Magnesium	6,200.
8.	Iron	1940.	17.	Sodium	19,200.
9.	Lead	<40.			

TASK 2 (Elements to be identified and measured)

		ug/l			ug/l
1.	Arsenic	<10	5.	Mercury	3.
2.	Antimony	<20.	6.	Tin	<100.[a]
3.	Selenium	<10.	7.	Silver	<20.
4.	Thallium	<10.			

TASK 3 (Elements to be identified and measured)

1.	Ammonia	mg/l	4.	Cyanide	<0.01 m
2.	Fluoride	mg/l	5.	pH	Un
3.	Sulfide	mg/l	6.	TOC	m

COMMENTS:
a) with a detection limit of 100.
b) with a detection limit of
c) with a detection limit of
d) analyzed on a sample aliquot preserved with HCl from F/[illegible] sample
e) average of two replicate determinations
f) insufficient sample aliquot

Sample #5
Organics

ORGANICS ANALYSIS DATA SHEET

E0447

LABORATORY NAME: Sverdrup Technology, Inc.

HESS
F5-8104-3

LAB SAMPLE ID NO. C1159...160

QC REPORT NO. Sverdrup 10

ACID COMPOUNDS

		ug/l
21A	2,4,6-trichlorophenol	ND
22A	p-chloro-m-cresol	
[illegible]	2-chlorophenol	
31A	2,4-dichlorophenol	
3[illegible]	2,4-dimethylphenol	19
57A	2-nitrophenol	ND
58A	4-nitrophenol	
59A	2,4-dinitrophenol	
60A	4,6-dinitro-o-cresol	
64A	pentachlorophenol	
[illegible]A	phenol	40

BASE/NEUTRAL COMPOUNDS

[illegible]	acenaphthene	ND
[illegible]B	benzidine	
[illegible]B	1,2,4-trichlorobenzene	
[illegible]B	hexachlorobenzene	
[illegible]2B	hexachloroethane	
[illegible]8B	bis(2-chloroethyl)ether	
[illegible]0B	2-chloronaphthalene	
[illegible]5B	1,2-dichlorobenzene	
[illegible]6B	1,3-dichlorobenzene	
[illegible]7B	1,4-dichlorobenzene	
[illegible]8B	3,3'-dichlorobenzidine	
[illegible]5B	2,4-dinitrotoluene	
[illegible]6B	2,6-dinitrotoluene	
[illegible]7B	1,2-diphenylhydrazine (as azobenzene)	
[illegible]9B	fluoranthene	
[illegible]B	4-chlorophenyl phenyl ether	

BASE/NEUTRAL COMPOUNDS

41B	4-bromophenyl phenyl ether	ND
42B	bis (2-chloroisopropyl) ether	
43B	bis (2-chloroethoxy) methane	
52B	hexachlorobutadiene	
53B	hexachlorocyclopentadiene	
54B	isophorone	
55B	naphthalene	122
56B	nitrobenzene	ND
61B	N-nitrosodimethylamine	
62B	N-nitrosodiphenylamine	
63B	N-nitrosodi-n-propylamine	
66B	bis (2-ethylhexyl) phthalate	
67B	butyl benzyl phthalate	
68B	di-n-butyl phthalate	
69B	di-n-octyl phthalate	
70B	diethyl phthalate	
71B	dimethyl phthalate	
72B	benzo(a)anthracene	
73B	benzo(a)pyrene	
74B	3,4-benzofluoranthene	
75B	benzo(k)fluoranthene	
76B	chrysene	
77B	acenaphthylene	
78B	anthracene	
79B	benzo(ghi)perylene	
80B	fluorene	
81B	phenanthrene	
82B	dibenzo(a,h)anthracene	
83B	indeno(1,2,3-cd)pyrene	
84B	pyrene	

LABORATORY NAME Sverdrup Technology, Inc.

LAB SAMPLE ID NO. C1159, C1160

QC REPORT NO. Sverdrup 10

	VOLATILES	ug/l
2V	acrolein	ND
3V	acrylonitrile	
4V	benzene	
5V	carbon tetrachloride	
6V	chlorobenzene	*
7V	1,2-dichloroethane	ND
8V	1,1,1-trichloroethane	
9V	1,1-dichloroethane	
10V	1,1,2-trichloroethane	
11V	1,1,2,2-tetrachloroethane	
12V	chloroethane	
13V	2-chloroethylvinyl ether	
14V	chloroform	33
15V	1,1-dichloroethylene	ND
16V	1,2-trans-dichloroethylene	
17V	1,2-dichloropropane	
18V	1,3-dichloropropylene	
19V	ethylbenzene	451
20V	methylene chloride	ND
21V	methyl chloride	
22V	methyl bromide	
23V	bromoform	
24V	dichlorobromomethane	*
25V	trichlorofluoromethane	ND
26V	dichlorodifluoromethane	
27V	chlorodibromomethane	
28V	tetrachloroethylene	
29V	toluene	198
30V	trichloroethylene	ND
31V	vinyl chloride	

	PESTICIDES	
89P	aldrin	N
90P	dieldrin	
91P	chlordane	
92P	4,4'-DDT	
93P	4,4'-DDE	
94P	4,4'-DDD	
95P	-endosulfan	
96P	-endosulfan	
97P	endosulfan sulfate	
98P	endrin	
99P	endrin aldehyde	
100P	heptachlor	
101P	heptachlor epoxide	
102P	-BHC	
103P	-BHC	
104P	-BHC	
105P	-BHC	
106P	PCB-1242	
107P	PCB-1254	
108P	PCB-1221	
109P	PCB-1232	
110P	PCB-1248	
111P	PCB-1260	
112P	PCB-1016	
113P	toxaphene	

	DIOXINS	
129B	2,3,7,8-tetrachlorodibenzo-p-dioxin	

*Less than 10 ug/l
(pesticides less than 5 ug/l)

QC Report No: Sverdr 10

E0447

A. SURROGATE SPIKE RESULTS

COMPOUND	Fraction	Conc. (ug/l)	(Surrogates only) Spike Added (ug/l)	% Recov
Bromochloromethane	VOA	82	80	103
1,4 - Dichlorobutane	VOA	71	80	89
2 - Fluorophenol	Acid	93	163	57
D5 - Phenol	Acid	85	160	53
D5 - Nitrobenzene	Base/Neut	149	164	91
2 - Fluorobiphenyl	Base/Neut	136	160	85
D8 - Naphthalene	Base/Neut	83	101	82

B. TENTATIVELY IDENTIFIED COMPOUNDS

	CAS #	COMPOUND NAME	Fraction	% Maximum Score Attained Mass Matching Routine: Purity (specify) Maximum 100 Purity Fit	
1.	93-54-9	Benzenemethanol, .alpha.-ethyl	AC		
2.	78-93-3	2-Butanone	VO	98	99
	71-36-3	1-Butanol	VO	94	98
4.	108-10-1	2-Pentanone, 4-Methyl-	VO	90	94
5.	123-86-4	Acetic acid, butyl ester	VO	97	99
6.	98-82-8	Benzene, (1-Methylethyl)-	VO	92	100
7.	106-42-3	Benzene, 1,4-Dimethyl-	VO	89	97
8.	108-38-3	Benzene, 1,3-Dimethyl-	VO	89	97
9.	103-65-1	Benzene, Propyl-	VO	88	96
0.	108-10-1	2-Pentanone, 4-Methyl-	BN	89	93
1.	108-38-3	Benzene, 1,3-Dimethyl-	BN	90	98
2.	111-76-2	Ethanol, 2-Butoxyl-	BN	93	98
3.	41898-89-9	2,3-Heptadiene,5-yne,2-4-Di-methyl	BN	72	91
4.	108-67-8	Benzene, 1,3,5-Trimethyl-	BN	75	89
5.	496-11-7	1H-Indene,2,3-Dihydro-	BN	76	83
6.	105-05-5	Benzene, 1,4-Diethyl-	BN	84	96
7.	55724-73-7	Butanoicacid, 4-Butoxy-	BN	74	84
8.	55334-40-2	Benzeneaceticacid, .alpha., 4-Bis/(Trimethylsilyl) oxy/-Methylester	BN	30	47

Metals

IRONMENTAL PROTECTION AGENCY - HWI Sample Management Office
ox 818 - Alexandria, Virginia 22313 - 703/ 557-2490/FTS-8-...-2490

Alside

INORGANICS ANALYSIS DATA SHEET

585-152

LABORATORY NAME Versar Inc. SAMPLE NO. ME 8284

LAB SAMPLE ID NO. 4374, 4378 QC REPORT NO. [illegible]

TASK 1 (Elements to be identified and measured)

		ug/l			ug/l
1.	Aluminum	50.	10.	Nickel	<20.
2.	Chromium	<10.	11.	Manganese	60.
3.	Barium	30.	12.	Zinc	220.
4.	Beryllium	<2.	13.	Boron	40.
5.	Cadmium	<5.	14.	Vanadium	<10.
6.	Cobalt	<10.	15.	Calcium	29,300.
7.	Copper	<20.	16.	Magnesium	5,900.
8.	Iron	300.	17.	Sodium	19,700
9.	Lead	<40.			

TASK 2 (Elements to be identified and measured)

		ug/l			ug/l
1.	Arsenic	<10	5.	Mercury	3.
2.	Antimony	<20.	6.	Tin	<50.[a]
3.	Selenium	<10.	7.	Silver	<20.
4.	Thallium	<10.			

TASK 3 (Elements to be identified and measured)

1.	Ammonia	mg/l	4.	Cyanide	<0.01 mg
2.	Fluoride	mg/l	5.	pH	Un
3.	Sulfide	mg/l	6.	TOC	mg

COMMENTS:

a) with a detection limit of 50.
b) with a detection limit of
c) with a detection limit of
d) analyzed on a sample aliquot preserved with HCl from F/pH sample b
e) average of two replicate determinations
f) insufficient sample aliquot

EPA POTENTIAL HAZARDOUS WASTE SITE
OFF-SITE INSPECTION REPORT 4/29/81 | V | OH-292-08

GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the information on this form to develop a Tentative Disposition (Section II). File this form in its entirety in the regional Hazardous Waste Log File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335), 401 M St., SW; Washington, DC 20460

I. SITE IDENTIFICATION

A. SITE NAME: ALSIDE, INC.
B. STREET (or other identifier): 3773 AKRON-CLEVELAND RD.
C. CITY: NORTHAMPTON TOWNSHIP
D. STATE: OHIO
E. ZIP CODE: 44223
F. COUNTY NAME: SUMMIT

G. SITE OPERATOR INFORMATION
1. NAME: SAME AS ABOVE
2. TELEPHONE NUMBER: (216) 929-1811
3. STREET:
4. CITY:
5. STATE:
6. ZIP CODE:

H. REALTY OWNER INFORMATION (If different from operator of site)
1. NAME: ALSIDE, INC., DIVISION of U.S. STEEL CORP.
2. TELEPHONE NUMBER:
3. CITY:
4. STATE:
5. ZIP CODE:

I. SITE DESCRIPTION: DISPOSES OF WASTE ON-SITE. MANUFACTURING PLANT of ALUMINUM & STEEL SIDING THAT STORES AND

J. TYPE OF OWNERSHIP
☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE

II. TENTATIVE DISPOSITION (complete this section last)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (mo., day, & yr.):
B. APPARENT SERIOUSNESS OF PROBLEM
☐ 1. HIGH ☐ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE

C. PREPARER INFORMATION
1. NAME: PAUL HESS
2. TELEPHONE NUMBER: (312) 663-9415
3. DATE (mo., day, & yr.): 5-5-81

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION
1. NAME: PAUL HESS
2. TITLE: CHEMICAL ENGINEER
3. ORGANIZATION: ECOLOGY AND ENVIRONMENT, INC. (FIT)
4. TELEPHONE NO. (area code & r): (312) 663-9415

B. INSPECTION PARTICIPANTS

1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
DAN SEWALL	ECOLOGY & ENVIRONMENT, INC.	(312) 663-9415

C. SITE REPRESENTATIVES INTERVIEWED (corporate officials, workers, residents)

1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
NONE (ENTRY AND INTERVIEW DENIED BY MR. COCHRAN - WRITER WAS ADVISED TO CONTACT THEIR		ATTORNEY, JAME ALLEN).

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
ALSIDE, INC.	(216) 929-1811	3773 AKRON-CLEVELAND RD	PAINT SLUDGE

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
UNKNOWN (OFF-SITE ONLY)			

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS
UNKNOWN (OFF-SITE ONLY)		

G. DATE OF INSPECTION (mo., day, & yr.)	H. TIME OF INSPECTION	I. ACCESS GAINED BY: (credentials must be shown in all cases)
4-29-81	9:50AM	☐ 1. PERMISSION ☐ 2. WARRANT DENIED

J. WEATHER (describe)

RAIN AND OVERCASED ; 67°F

IV. SAMPLING INFORMATION

A. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO:	4. DATE RESULTS AVAILABLE
a. GROUNDWATER	OFF-SITE INSPECTION ONLY - NO SAMPLES		
b. SURFACE WATER			
c. WASTE			
d. AIR			
e. RUNOFF			
f. SPILL			
g. SOIL			
h. VEGETATION			
i. OTHER (specify)			

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS
NONE (PLANT IS LOCATED ON A		53.75 ACRE SITE)

Continue On Page 3

Continued From Page 2

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS: [X] a. GROUND [ ] b. AERIAL

2. PHOTOS IN CUSTODY OF: FILE

D. SITE MAPPED?

[X] YES. SPECIFY LOCATION OF MAPS: FILE

E. COORDINATES

1. LATITUDE (deg.-min.-sec.): 41° 10' 22"

2. LONGITUDE (deg.-min.-sec.): 81° 30' 22"

V. SITE INFORMATION

A. SITE STATUS

[X] 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

[ ] 2. INACTIVE (Those sites which no longer receive wastes.)

[ ] 3. OTHER (specify): _____ (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

[ ] 1. NO [X] 2. YES (specify generator's four-digit SIC Code): 347

C. AREA OF SITE (in acres): 53.75 ACRES

D. ARE THERE BUILDINGS ON THE SITE?

[ ] 1. NO [X] 2. YES (specify): BUILDINGS. ONE LARGE PLANT WITH FIVE(5) SMALLER OUT

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

X	A. TRANSPORTER	X	B. STORER	X	C. TREATER	X	D. DISPOSER
	1. RAIL		1. PILE		1. FILTRATION	X	1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE	X	3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
	4. TRUCK		4. TANK, ABOVE GROUND		4. RECYCLING/RECOVERY	X	4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEM./PHYS./TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify):		6. OTHER (specify):		6. BIOLOGICAL TREATMENT		6. INCINERATION
					7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY		8. OTHER (specify):
					9. OTHER (specify):		

E. SUPPLEMENTAL REPORTS: If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

[ ] 1. STORAGE [ ] 2. INCINERATION [ ] 3. LANDFILL [ ] 4. SURFACE IMPOUNDMENT [ ] 5. DEEP WELL

[ ] 6. CHEM/BIO/PHYS TREATMENT [ ] 7. LANDFARM [ ] 8. OPEN DUMP [ ] 9. TRANSPORTER [ ] 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

[ ] 1. LIQUID [ ] 2. SOLID [X] 3. SLUDGE [ ] 4. GAS

B. WASTE CHARACTERISTICS

[ ] 1. CORROSIVE [X] 2. IGNITABLE [ ] 3. RADIOACTIVE [ ] 4. HIGHLY VOLATILE

[X] 5. TOXIC [ ] 6. REACTIVE [ ] 7. INERT [ ] 8. FLAMMABLE

[ ] 9. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

UNKNOWN (UNABLE TO EVALUATE)

C. Estimate the amount (specify unit of measure) of waste by category. Mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT: 255,000	AMOUNT:	AMOUNT:	AMOUNT:	AMOUNT:	AMOUNT:
UNIT OF MEASURE: Cubic Feet	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE:
X (1) PAINT, PIGMENTS	X (1) OILY WASTES	X (1) HALOGENATED SOLVENTS	X (1) ACIDS	X (1) FLYASH	X (1) LABORATOR PHARMACEU
(2) METALS SLUDGES	(2) OTHER(specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER(specify):	(3) CAUSTICS	(3) MILLING/MINE TAILINGS	(3) RADIOACTIV
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMELTING WASTES	(4) MUNICIPAL
X (5) OTHER(specify): Chrome Salt Sludge From Aluminum Treament Process.			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER(speci
			(6) CYANIDE	(6) OTHER(specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER(specify):		

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X') a. SOLID	b. LIQ.	c. VAPOR	3. TOXICITY (mark 'X') a. HIGH	b. MED.	c. LOW	d. NONE	4. CAS NUMBER	5. AMOUNT	6. UNI
Paint Pigment Sludge	X				X				5,000	FT
Chrome Salt Sludge	X				X				250,000	FT

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

☒ A. HUMAN HEALTH HAZARDS

Organic Solvents and Metal Salts (Chrome) can contaminate near by Drinking Well Water.

Continue On Page 5

☐ B. NON-WORKER INJURY/EXPOSURE

NA

☐ C. WORKER INJURY/EXPOSURE

NA

☒ D. CONTAMINATION OF WATER SUPPLY

BURIED CHROME SLUDGE AND SOLVENTS CAN CONTAMINATE GROUND WATER AND WATER SUPPLY WELLS IN AREA FROM RUN-OFF.

☐ E. CONTAMINATION OF FOOD CHAIN

NA

☒ F. CONTAMINATION OF GROUND WATER

SEE ABOVE NO. "D".

☒ G. CONTAMINATION OF SURFACE WATER

SEE ABOVE NO. "D".

☐ H. DAMAGE TO FLORA/FAUNA

NA

☐ I. FISH KILL

NA

☒ J. CONTAMINATION OF AIR

VERBAL REPORT TO WRITER THAT LITIGATION IS PENDING ON AIR QUALITY STANDARDS VIOLATION FROM PAINT DRYING OVEN EXHAUST SYSTEM BY U.S.EPA PERSONNEL.

☒ K. NOTICEABLE ODORS

RESIDENTS IN AREA HAVE FILED COMPLAINTS OF PAINT ODORS. SOLVENT ODORS WERE PRESENT AT TIME OF WRITER'S VISIT TO SITE, BUT ODORS WERE NOT OBJECTIONABLE.

☒ L. CONTAMINATION OF SOIL

CHROMATE SALT SLUDGE IS REPORTED TO HAVE BEEN BURIED ON SITE.

☐ M. PROPERTY DAMAGE

NA

Continue On Page 7

☐ N. FIRE OR EXPLOSION

NA

☒ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

THERE HAVE BEEN RESIDENT COMPLAINTS OF CHEMICAL SPILLS AT SITE. THE LAST REPORTED SPILL WAS 3/2/81. WRITER HAS NOT BEEN ON-SITE AS YET TO EVALUATE SPILL AREAS OR DRUM CONDITION.

(OHEPA FILES)

☐ P. SEWER, STORM DRAIN PROBLEMS

NA.

☐ Q. EROSION PROBLEMS

NA

☐ R. INADEQUATE SECURITY

NA

☐ S. INCOMPATIBLE WASTES

NA

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

NA

☐ U. OTHER (specify):

NA

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS	500	500	200	1 MILE
2. IN COMMERCIAL OR INDUSTRIAL AREAS	1200	1200	25	1 MILE
3. IN PUBLICLY TRAVELLED AREAS				
4. PUBLIC USE AREAS (parks, schools, etc.)				

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit)	B. DIRECTION OF FLOW	C. GROUNDWATER USE IN VICINITY
30 FEET	EAST BY NORTHEAST	WELLS (DRINKING)
D. POTENTIAL YIELD OF AQUIFER	**E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure)**	**F. DIRECTION TO DRINKING WATER SUPP**
NOT KNOWN	2000 FEET	NORTH AND SOUTHEAS

G. TYPE OF DRINKING WATER SUPPLY

☐ 1. NON-COMMUNITY < 15 CONNECTIONS ☐ 2. COMMUNITY (specify town): > 15 CONNECTIONS

☐ 3. SURFACE WATER ☒ 4. WELL

Continue On Page 9

Continued From Page 8

X. WATER AND HYDROLOGICAL DATA (continued)

H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COMMUNITY (mark 'X')	5. COMMUNITY (mark 'X')
ATLANTIC RICHFIELD	95 FT.	4005 AKRON-CLEVELAND Rd.	X	
CANFIELD	98 FT.	51 VALENCIA ST.	X	
ALSIDE, INC	125 FT.	3773 AKRON-CLEVELAND Rd.	X	
ROBERT WALKER	120 FT.	196 COCHRAN RD.	X	

I. RECEIVING WATER

1. NAME: MUD BROOK VIA UNNAMED TRIBUTARY

☐ 2. SEWERS ☒ 3. STREAMS/RIVERS ☐ 4. LAKES/RESERVOIRS ☐ 5. OTHER (specify):

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

XI. SOIL AND VEGITATION DATA

LOCATION OF SITE IS IN:

☐ A. KNOWN FAULT ZONE ☐ B. KARST ZONE ☐ C. 100 YEAR FLOOD PLAIN ☒ D. WETLAND

☐ E. A REGULATED FLOODWAY ☐ F. CRITICAL HABITAT ☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER

XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

*X	A. OVERBURDEN	*X	B. BEDROCK (specify below)	X*	C. OTHER (specify below)
	1. SAND				
X	2. CLAY + GRAVEL	X	SHARON SANDSTONE (100 FT)	X	A SAND AND GRAVEL FILLED, BURIED VALLEY - SOUTHEAST.
	3. GRAVEL				

XIII. SOIL PERMEABILITY

☒ A. UNKNOWN ☐ B. VERY HIGH (100,000 to 1000 cm/sec.) ☐ C. HIGH (1000 to 10 cm/sec.)

☐ D. MODERATE (10 to .1 cm/sec.) ☐ E. LOW (.1 to .001 cm/sec.) ☐ F. VERY LOW (.001 to .00001 cm/sec.)

G. RECHARGE AREA

☐ 1. YES ☐ 2. NO 3. COMMENTS:

H. DISCHARGE AREA

☐ 1. YES ☐ 2. NO 3. COMMENTS:

I. SLOPE

1. ESTIMATE % OF SLOPE	2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.
30%	LAND SLOPES TO THE EAST INTO A SWAMPY AREA.

J. OTHER GEOLOGICAL DATA

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yrs.)	E. EXPIRATION DATE (mo., day, & yrs.)	F. IN COMPLIANCE (mark 'X') 1. YES	2. NO	3. UNKNOWN
NPDES	OEPA	S 347*AD					X

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

☐ NONE ☒ YES (summarize in this space)

(1) NON-COMPLIANCE OF NPDES PERMIT COMPLAINT, (6/3/76).

(2) SECTION 311 COMPLAINT, (10/7/80).

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition *(Section II)* information on the first page of this form.

EPA — POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the in tion on this form to develop a Tentative Disposition (*Section II*). File this form in its entirety in the regional Hazardous Wast File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms to: U.S. Environmental tection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (*EN-335*); 401 M St., SW; Washington, DC

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET (or other identifier)		
ALSIDE, INC.	3773 AKRON-CLEVELAND R		
C. CITY	**D. STATE**	**E. ZIP CODE**	**F. COUNTY NAME**
NORTHAMPTON TOWNSHIP	OHIO	44223	SUMMIT

G. SITE OPERATOR INFORMATION

1. NAME	2. TELEPHONE NUMBER
SAME AS ABOVE	(216) 929-181
3. STREET	**4. CITY**
5. STATE	**6. ZIP CODE**

H. REALTY OWNER INFORMATION (*if different from operator of site*)

1. NAME	2. TELEPHONE NUMBER
UNITED STATES STEEL CORPORATION	(412) 433-6
3. CITY	**4. STATE** / **5. ZIP CODE**
PITTSBURGH	PA. / 15

I. SITE DESCRIPTION MANUFACTURING PLANT OF ALUMINUM, STEEL AND PLASTIC SIDING THAT STORES AND HAS DISPOSED OF WASTE

J. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE

II. TENTATIVE DISPOSITION (*complete this section last*)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (*mo., day, & yr.*)	B. APPARENT SERIOUSNESS OF PROBLEM
	☐ 1. HIGH ☒ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE

C. PREPARER INFORMATION

1. NAME	2. TELEPHONE NUMBER	3. DATE (*mo., day, & yr.*)
PAUL HESS	(312) 663-9415	6-10-81

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION

1. NAME	2. TITLE
PAUL HESS	CHEMICAL ENGINEER
3. ORGANIZATION	**4. TELEPHONE NO.** (*area c*
ECOLOGY AND ENVIRONMENT, INC. (F.I.T.)	(312) 663-9

B. INSPECTION PARTICIPANTS

1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
MELINDA BECKER	OHIO EPA (NEDO)	(216) 425-91
CYNDI BACHMANAS	ECOLOGY & ENVIRONMENT (F.I.T.)	(312) 663-9
ANN WEAVER	ECOLOGY & ENVIRONMENT (F.I.T.)	(312) 663-9
BOB WACHSMUTH	ECOLOGY & ENVIRONMENT (F.I.T.)	(312) 663-9

C. SITE REPRESENTATIVES INTERVIEWED (*corporate officials, workers, residents*)

1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
JAMES F. ALLEN	ATTORNEY (216) 696-9200	CLEVELAND, OHIO 1800 UNION COMMERCE BUILDING
LARRY L. COCHRAN	DIR. of MFG. (216) 929-1811	CUYAHOGA FALLS, OHIO 3773 AKRON-CLEVELAND RD.
FRANK J. BOINSKI	ENVIRONMENT ENGINEER (412) 433-6009	U.S. STEEL CORP. 600 GRANT ST., PITTSBURGH,

Continue On R

Continued From Page 2

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS: ☐ a. GROUND ☒ b. AERIAL (ORDERED)
2. PHOTOS IN CUSTODY OF: U.S. EPA - DPO

D. SITE MAPPED?

☒ YES. SPECIFY LOCATION OF MAPS: ATTACHED

E. COORDINATES

1. LATITUDE (deg.-min.-sec.): 41° 15' 22"
2. LONGITUDE (deg.-min.-sec.): 81° 30' 22"

V. SITE INFORMATION

A. SITE STATUS

☒ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

☐ 2. INACTIVE (Those sites which no longer receive wastes.)

☐ 3. OTHER (specify): _____ (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

☐ 1. NO ☒ 2. YES (specify generator's four-digit SIC Code): 347

C. AREA OF SITE (in acres): 53.75 ACRES

D. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES (specify): ONE LARGE PLANT WITH FIVE (5) SMALLER BUILDINGS

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

A. TRANSPORTER	B. STORER	C. TREATER	D. DISPOSER
			X 1. LANDFILL
	X 2. SURFACE IMPOUNDMENT		2. LANDFARM
	X 3. DRUMS		3. OPEN DUMP
X 4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	X 4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS./TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		X 9. OTHER (specify):	

E. SUPPLEMENTAL REPORTS: If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

☒ 1. STORAGE ☐ 2. INCINERATION ☒ 3. LANDFILL ☒ 4. SURFACE IMPOUNDMENT ☐ 5. DEEP WELL

☐ 6. CHEM/BIO/PHYS TREATMENT ☐ 7. LANDFARM ☐ 8. OPEN DUMP ☐ 9. TRANSPORTER ☐ 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

☒ 1. LIQUID ☐ 2. SOLID ☒ 3. SLUDGE ☐ 4. GAS

B. WASTE CHARACTERISTICS

☐ 1. CORROSIVE ☒ 2. IGNITABLE ☐ 3. RADIOACTIVE ☐ 4. HIGHLY VOLATILE
☒ 5. TOXIC ☐ 6. REACTIVE ☐ 7. INERT ☐ 8. FLAMMABLE

☐ 9. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

BASICALLY NO - THEY HAVE FOUR (4) MANIFESTS FOR WASTE SOLVENTS.

VII. WASTE RELATED INFORMATION (continued)

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT: 255,000	AMOUNT:	AMOUNT: 10,000	AMOUNT:	AMOUNT: UNKNOWN	AMOUNT:
UNIT OF MEASURE: GALLONS	UNIT OF MEASURE:	UNIT OF MEASURE: GALLONS	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE:
X (1) PAINT, PIGMENTS	X (1) OILY WASTES	X (1) HALOGENATED SOLVENTS	X (1) ACIDS	X (1) FLYASH	X (1) LABORATORY, PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	X (2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify): SOLVENT TYPE F003 + F005 AS DEFINED UNDER RCRA	(3) CAUSTICS	(3) MILLING/MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMELTING WASTES	(4) MUNICIPAL
X (5) OTHER (specify): UNKNOWN AMOUNT OF CHROME SALTS AS SLUDGE AND PAINT SLUDGE BURIED ON SITE.			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	X (6) OTHER (specify): COMPANY HAS BURIED DEBRIS, SUCH AS ALUMINUM, STEEL, PLASTIC, WOOD FIBER, AND PAPER SCRAP ALONG WITH SOME DRUMS.	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify):		

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X') a. SOLID	b. LIQ.	c. VAPOR	3. TOXICITY (mark 'X') a. HIGH	b. MED.	c. LOW	d. NONE	4. CAS NUMBER	5. AMOUNT	6. UNIT
PAINT SLUDGE	X				X				255,000	GAL.
CHROME SLUDGE	X				X				UNKNOWN	
PAINT WASTE SOLVENT		X				X			10,000	GAL.

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

X A. HUMAN HEALTH HAZARDS

ORGANIC WASTE SOLVENTS AND METAL SALTS (CHROME AND CROMIUM COULD, WITH TIME, CONTAMINATE DOWN STREAM WELL WATERS

VIII. HAZARD DESCRIPTION (continued)

☐ B. NON-WORKER INJURY/EXPOSURE

NA

☐ C. WORKER INJURY/EXPOSURE

NA

☒ D. CONTAMINATION OF WATER SUPPLY

SEE NO. "A" ABOVE.

☐ E. CONTAMINATION OF FOOD CHAIN

NA

☒ F. CONTAMINATION OF GROUND WATER

THE WATER SURFACE OF THE CREEK RUNNING THROUGH THIS SITE HAD A OILY FILM. THIS FILM WAS OBSERVED AT ONE OF THE FIELD TILE DISCHARGE POINTS (SAMPLE TAKEN) WHICH CARRIES GROUND WATER FROM AREA OF PAINT SLUDGE STORAGE. PAINT AND CHROME SLUDGE BURIED ON SITE IS BELIEVED TO BE IN LINE OF SURFACE WATER RUN-OFF

☒ G. CONTAMINATION OF SURFACE WATER

SEE NO. "F" ABOVE.

VIII. HAZARD DESCRIPTION (continued)

☐ H. DAMAGE TO FLORA/FAUNA

NA

☐ I. FISH KILL

NA

☐ J. CONTAMINATION OF AIR

NA

☒ K. NOTICEABLE ODORS

THE SAMPLING POINT OF DISCHARGE FROM SURFACE WATER TO CREEK HAD A STRONG ODOR OF PAINT SOLVENT. THE DRUM WASTE STORAGE AREA HAD A SLIGHT ODOR OF PAINT SOLVENT, BUT THE ODOR WAS GREATLY REDUCED, BECAUSE THE SURROUNDING SOIL WAS SATURATED FROM RECENT RAIN

☒ L. CONTAMINATION OF SOIL

THE SOIL AROUND THE STORED WASTE DRUMS HAD BEEN RECENTLY GRADED AND WAS SATURATED WITH RECENT RAIN, BUT BETWEEN THE DRUMS, THERE WAS EVIDENCE OF SPILLS AND SOIL CONTAMINATION. ALSO, DRUMS HAD BEEN TIPPED TO THEIR SIDE OR ON-END DUE TO LEAKING DRUMS.

☐ M. PROPERTY DAMAGE

NA

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VIII. HAZARD DESCRIPTION (continued)

☒ N. FIRE OR EXPLOSION

THE PAINT WASTE SOLVENT IS IGNITABLE AND SUBJECT TO A FIRE HAZARD IF MISUSED.

☒ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

SEE NO. "2" ABOVE

☐ P. SEWER, STORM DRAIN PROBLEMS

NA

☒ Q. EROSION PROBLEMS THE DRUM STORAGE AREA AND SLOPING GROUND TO CREEK LACKS VEGETATION AND SHOWS SIGNS OF HEAVY EROSION.

☐ R. INADEQUATE SECURITY

NA

☐ S. INCOMPATIBLE WASTES

NA

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

NA

☐ U. OTHER (specify):

NA

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS		500	200	1 MILE
2. IN COMMERCIAL OR INDUSTRIAL AREAS		1200	25	1 MILE
3. IN PUBLICLY TRAVELLED AREAS				
4. PUBLIC USE AREAS (parks, schools, etc.)				

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit)	B. DIRECTION OF FLOW	C. GROUNDWATER USE IN VICINITY
50 FEET	EAST BY NORTH EAST	WELLS (DRINKING)
D. POTENTIAL YIELD OF AQUIFER	**E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure)**	**F. DIRECTION TO DRINKING WATER SUPPLY**
UNKNOWN	ONE HALF MILE	NORTH, WEST, AND SOUTHEAST

G. TYPE OF DRINKING WATER SUPPLY

☐ 1. NON-COMMUNITY < 15 CONNECTIONS* ☑ 2. COMMUNITY (specify town): NORTHAMPTON TOWNSHIP > 15 CONNECTIONS

☐ 3. SURFACE WATER ☑ 4. WELL

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X. WATER AND HYDROLOGICAL DATA (continued)

H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COMMUNITY (mark 'X')	5. COMMUNITY (mark 'X')
Rod Sta.	95 Ft.	4005 Akron-Cleveland Rd.	X	
Canfield	98 Ft.	51 Valencia St.	X	
Alsine	125 Ft.	3773 Akron-Cleveland Rd	X	
Walker	120 Ft.	196 Cochran Rd.	X	

I. RECEIVING WATER

1. NAME Mud Brook (Via Unnamed Tributary) | ☐ 2. SEWERS | ☒ 3. STREAMS/RIVERS | ☒ 4. LAKES/RESERVOIRS | ☐ 5. OTHER (specify):

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

The Swampy Creek Area East of Plant Maintains Wildlife. Unnamed Creek Flows Into Mud Brook Which Is Tributary of Cuyahoga River.

XI. SOIL AND VEGITATION DATA

LOCATION OF SITE IS IN:

☐ A. KNOWN FAULT ZONE ☐ B. KARST ZONE ☐ C. 100 YEAR FLOOD PLAIN ☒ D. WETLAND

☐ E. A REGULATED FLOODWAY ☐ F. CRITICAL HABITAT ☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER

XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

A. OVERBURDEN	B. BEDROCK (specify below)	C. OTHER (specify below)
1. SAND	X Sharon Sandstone (100 Ft.)	X Buried Sand-Gravel Valley Southeast of Site.
X 2. CLAY + GRAVEL Mix		
3. GRAVEL		

XIII. SOIL PERMEABILITY

☒ A. UNKNOWN ☐ B. VERY HIGH (100,000 to 1000 cm/sec.) ☐ C. HIGH (1000 to 10 cm/sec.)
☐ D. MODERATE (10 to .1 cm/sec.) ☐ E. LOW (.1 to .001 cm/sec.) ☐ F. VERY LOW (.001 to .00001 cm/sec.)

G. RECHARGE AREA
☒ 1. YES ☐ 2. NO 3. COMMENTS: Drum Storage Area Lies Some 20 Feet Above Swamp and Has Three Drainage Fields.

H. DISCHARGE AREA
☒ 1. YES ☐ 2. NO 3. COMMENTS: Swampy Area and Creek East of Site.

I. SLOPE

1. ESTIMATE % OF SLOPE	2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.

J. OTHER GEOLOGICAL DATA

The Ground Cover Around and Under Drum Storage Area is Heavily Mixed With Debris; Shows Signs of Erosion Due To Lack of Vegetation; Has Three (3) Field Drainage Discharges For Ground and/or Surface Water; One Non-Contact Cooling Water Discharge — All Discharges Empty Into Swampy Area East of Plant.

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X') 1. YES	2. NO	3. UNKNOWN
NPDES	OHIO EPA	3 3-M *AD	UNKNOWN	HA-3 EXPIRED			X
RCRA - PART "A"	U.S. EPA	OHD 004113 353	FILED 4-7-81			X	

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

☐ NONE ☒ YES (summarize in this space)

1.) NON-COMPLIANCE OF NPDES PERMIT - COMPLAINT, 6-3-76, OHIO EPA.

2.) SECTION 311 COMPLAINT, 10-7-80, OHIO EPA.

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition *(Section II)* information on the first page of this form.

STORAGE FACILITIES SITE INSPECTION REPORT
(Supplemental Report)

INSTRUCTION: Answer and Explain as Necessary.

1. STORAGE AREA HAS CONTINUOUS IMPERVIOUS BASE

[ ] YES [X] NO — Drum Storage Area Sits Over Landfill Area

2. STORAGE AREA HAS A CONFINEMENT STRUCTURE

[X] YES [ ] NO — 6FT High - Cyclone Fence

3. EVIDENCE OF LEAKAGE/OVERFLOW *(If "Yes", document where and how much runoff is overflowing or leaking from containment)*

[X] YES [ ] NO — Company Admits that Leaky Drums Are Turned on Their Side or On-End to Confine Spillage. Sampling Point Discharge Shows Evidence of Paint Waste Solvent Migration into Surface Water Run-off.

4. ESTIMATE TYPE AND NUMBER OF BARRELS/CONTAINERS

Approximately 2,400 Drums Paint Sludge - 300 Drums Waste Solvent

5. GLASS OR PLASTIC STORAGE CONTAINERS USED

[ ] YES [X] NO

6. ESTIMATE NUMBER AND CAPACITY OF STORAGE TANKS

None - Drums Only.

7. NOTE LABELING ON CONTAINERS

None

8. EVIDENCE OF LEAKAGE CORROSION OR BULGING OF BARRELS/CONTAINERS/STORAGE TANKS *(If "Yes", document evidence. Describe location and extent of damage. Take PHOTOGRAPHS)*

[ ] YES [X] NO — Most Drums Used for Storage are Open-Headed Drums with Lids and Steel Bands. However, Company's Practice of Decanting Liquid Paint Waste Solvent Layer from Solid Paint Sludge Layer in the Storage Area Must Lead to Spills, Because Pouring Liquid from a 55 Gallon Drum by Lifting and Tipping is not an Efficient System.

9. DIRECT VENTING OF STORAGE TANKS

[ ] YES [ ] NO — N/A

10. CONTAINERS HOLDING INCOMPATIBLE SUBSTANCES *(If "Yes", document evidence. Describe location and identity of hazardous waste. Take PHOTOGRAPHS.)*

[ ] YES [X] NO

11. INCOMPATIBLE SUBSTANCES STORED IN CLOSE PROXIMITY *(If "Yes", document evidence. Describe location and identity of hazardous waste. Take PHOTOGRAPHS.)*

[ ] YES [X] NO

12. ADEQUATE CONTAINER WASHING AND REUSE PRACTICES

[ ] YES [X] NO — None

13. ADEQUATE PRACTICES FOR DISPOSAL OF EMPTY STORAGE CONTAINERS

[ ] YES [X] NO — None

LANDFILLS SITE INSPECTION REPORT
(Supplemental Report)

INSTRUCTION
Answer and Explain as Necessary.

1. EVIDENCE OF SITE INSTABILITY (Erosion, Settling, Sink Holes, etc)
☒ YES ☐ NO EROSION DUE TO LOSS OF VEGETATION - TOP SOIL, CLAY FOR WELL

2. EVIDENCE OF IMPROPER DISPOSAL OF BULK LIQUIDS, SEMI-SOLIDS AND SLUDGES INTO THE LANDFILL
☐ YES ☒ NO

3. CHECK RECORDS OF CELL LOCATION AND CONTENTS AND BENCHMARK
☒ YES ☐ NO COMPANY HAS NO RECORDS.

4. WASTES SURROUNDED BY SORBENT MATERIAL
☒ YES ☐ NO LARGE AMOUNT OF DEBRIS (WOOD FIBER + PAPER) AND CLAY.

5. DIVERSION STRUCTURES ARE EFFECTIVELY CONSTRUCTED AND PROPERLY MAINTAINED
☐ YES ☒ NO

6. EVIDENCE OF PONDING OF WATER ON SITE
☒ YES ☐ NO
ONE OF FOUR (4) PONDING IS STILL OPEN, BUT IS BEING FILLE

7. EVIDENCE OF IMPROPER/INADEQUATE DRAINING
☐ YES ☒ NO

8. ADEQUATE LEACHATE COLLECTION SYSTEM (If "Yes", specify Type)
☐ YES ☒ NO
ALL WATER RUN-OFF ENTERS SWAMP AND CREEK.

8a. SURFACE LEACHATE SPRING
☐ YES ☒ NO

9. RECORDS OF LEACHATE ANALYSIS
☐ YES ☒ NO

10. GAS MONITORING
☐ YES ☒ NO

11. GROUNDWATER MONITORING WELLS
☐ YES ☒ NO

12. ARTIFICIAL MEMBRANE LINER INSTALLED
☐ YES ☒ NO

13. SPECIFIC CONTAINMENT MEASURES (Clay Bottom, Sides, etc)
☐ YES ☒ NO

14. FIXATION (Stabilization) OF WASTE
☐ YES ☒ NO NONE FOR PAINT WASTE SOLVENTS - UNKNOWN FOR METALS

ADEQUATE CLOSURE OF INACTIVE PORTION OF FACILITY
☐ YES ☒ NO DEBRIS AND PARTIALLY BURIED DRUMS VISABLE.

16. COVER (Type)
CLAY, GRAVEL, AND MIXED DEBRIS.

16a. THICKNESS
UNKNOWN

16b. PERMEABILITY
UNKNOWN

16c. DAILY APPLICATION
☐ YES ☐ NO NOT NEEDED - BURYING OF WASTE HAS STOPPED.

SURFACE IMPOUNDMENTS SITE INSPECTION REPORT *(Supplemental Report)*	INSTRUCTION Answer and Explain as Necessary.

1. TYPE OF IMPOUNDMENT

THIS POUND WAS USED TO SETTLE CHROME SLUDGE.

2. STABILITY/CONDITION OF EMBANKMENTS

COMPANY IS IN PROCESS OF CLOSEING POUND WITH CLAY FIL

3. EVIDENCE OF SITE INSTABILITY *(Erosion, Settling, Sink Holes, etc.)*

☐ YES ☒ NO

4. EVIDENCE OF DISPOSAL OF IGNITABLE OR REACTIVE WASTE

☐ YES ☒ NO

5. ONLY COMPATIBLE WASTES ARE STORED OR DISPOSED OF IN THE IMPOUNDMENT

☐ YES ☐ NO NA - COMPANY IS NO LONGER USING POUND FOR WASTE.

6. RECORDS CHECKED FOR CONTENTS AND LOCATION OF EACH SURFACE IMPOUNDMENT

☒ YES ☐ NO NONE

7. IMPOUNDMENT HAS LINER SYSTEM

☒ YES ☐ NO CLAY ONLY - OVERFLOW DISCHARGE

7a. INTEGRITY OF LINER SYSTEM CHECKED

☐ YES ☒ NO COMPANY FORBID SAMPLES OR INSPECTION OF POUND

7b. FINDINGS

NA

8. SOIL STRUCTURE AND SUBSTRUCTURE

UNKNOWN

9. MONITORING WELLS

☐ YES ☒ NO

10. LENGTH, WIDTH, AND DEPTH

LENGTH WIDTH DEPTH COMPANY WOULD NOT COMMENT.

11. CALCULATED VOLUMETRIC CAPACITY

UNKNOWN

12. PERCENT OF CAPACITY REMAINING

UNKNOWN

13. ESTIMATE FREEBOARD

UNKNOWN

14. SOLIDS DEPOSITION

☒ YES ☐ NO CHROMATE SALTS

15. DREDGING DISPOSAL METHOD

CLAY FILL.

16. OTHER EQUIPMENT

COMPANY DENIED WRITER THE RIGHT TO INSPECT OR SAMPLE IMPOUNDMENT ON-SITE, BECAUSE THEY FELT THEY HAD ABANDON THIS SITE AND IT WAS NOW COVERED ONLY UNDER SUPERFUND LEGISATION, AND NOT RCRA OR CLEAN WATER ACT.

2/18/81

Chronology of events

Background Info on

Alsid, Inc.

8-25-80 Paphe - Prelim. Assessment Form
Site area ~4 acres, active
27,500 gal paint sludge. Collected
samples 7-30-80.

9-3-80 Paphe's site insp. report on
7-30-80 insp. photos taken
~500 barrels stored on permable base
w/ no containment structure.

9-15-80 Memo from Clark to Paphe
Clark's suggestions to Paphe on
installing monitoring wells & requesting
info on waste disposal.

10-7-80 Paphe's 311 demand letter
Demands:
1) Removal of drums
2) Identify all waste disposal areas
3) Prevent migration of contam.
groundwater

10-9-80 Lab 311 results on 2 sediment samples
taken 8-8-80; Samples weren't rec'd at CRL
until 9-9-80 (sat for 1 month). Probably
sat in lab for about a month.
Analyzed only for purgeable organics.
SO7 had 850 ppb trichloroethylene;
no 311 materials in SO6.

10-14-80 FOI request from Alside's attorney for access to Region's file on Co.

10-27-80 Letter from Sandee to Alside's attorney responding to FOI request.

11-13-80 Phone memo from Kate to Teri Fay / Ohio AG's office following discussion w/ people. Co. filed for state license, it was denied and company sued; Company proposed settlement to close facility in Jan 81; argued terms of closure.

OEPA wanted gw monitoring as part of closure but suspects co. won't cooperate - long litigation.

11-24-80 Phone memo - Kate to Shalima (neighbor) Alside part of U.S. Steel, used site for 22 years for waste disposal. Air violation issued in past - Air Enf. (talk to them) Paint taken off local homes.

← see next page

12-17-80 Kate to Jane memo.
re: FOI request / 311 demand & no response
Lynn Clark knows little. Teri Fay negotiating site closure for 1-31-81 - Co. arguing terms of closure esp. well monitoring.

Jane suggests:
1) Follow up letter from Papke & Co. threatening use of 311 funds, or
2) AO & assess compliance with RCRA closure requirements
3) 3013 Order for g.w. monitoring.

12-8-80 Letter from Allside & Co giving sign off authority - not sent.

12-11-80 Allside's 311 response.
Co. feels demand unsubstantiated & that compounds identified have not been used by Co. Co. sites other possible polluters of Judd Brook. Co stated ~~drums~~ barrels were either empty or contained paint sludges which would be disposed of off site. Co. denies activities leading to contamination of surface & groundwater. OEPA aware of waste disposal areas on Co's property.

12-22-80 P Kane memo Kato & Papke
re: 311 demand specifics; samples taken of soil & swamp area behind property, little vegetation observed. Chadwin has photos of holes w/ waste, now covered.

12-22-80 Kate → Teri Fay.
Fay asked OEPA to inspect site, to prepare
for closure. Co. sent letter to Fay 11-19-80
~~state co.~~ indicating on site disposal ceased.
Doesn't know where wastes are going now;
indicated most wastes now are packaging waste;
paint sludge buried stopped 4-5 years ago.
State plans to sue Co. in 1981 for g.w.
monitoring & site cleanup. OEPA supposedly
to inspect in Jan '81., Fay will file suit
regardless of USEPA action.

12-17-80 Letter from Jack Bergman, OEPA to
Alcide plant supt. re: 12-10-80 site visit
to closed landfill.
Site appeared properly closed but suggested,
more cover, regrading, seeding, &
g.w. wells.

12-31-81 Letter from Kate → Chadima
re: her conversation with OAG & own
investigation; requested any copies of g.w.
sample results he has.

1-5-81 Kate to Paphe phone memo:
Paphe feels that RCRA Order would be
more productive than 311 follow up.

1-6-81 Kate → me
Re: HMERP decision on site; 155 insp. recommended.

1-6-81 Phone memo Kate to Clark.
Clark wants wells because of pest dumping & paint residues & (organic chemicals?)
OEPA waiting for Spring & final grading before proceeding w/ sent.

1-6-81 phone memo ~~fm~~ Kate to Jack Burgan
Jack inspected site on 1270-80, saw barrels on site but ~~not~~ currently operated. SEM was hauling waste to Hardy Rd. landfill.

1-6-81 Phone memo Kate to Vandertan
He indicated 311 would be pursued through RRT but don't know when.

1-6-81 Kate case history to USEPA/OEPA persons involved; Summaries w/ to & date;

1-7-81 Phone memo Papke & Kate.
Clark indicated to Papke that co. would install wells in spring.

1-16-81 Letter from Fenner to Jerry Fay expressing EPA's willingness & desire in State gw monitoring efforts & settlement.

2-2/81 Phone memo Kati to Jerry Fay. Fay would like to see an issue 3013 for gw monitoring. Bergsen Burgess 12-17-80 memo & co, if he is holding off suit until spring. Co. will fight State on wells.

2-12-81 Phone memo Chadima to Marianne Baringarten He wanted update on Region 10 actions.

2-18-81 Phone memo To Chadima from Kati Left message on impending action & asked for photos & graph results he has.

RECORD OF COMMUNICATION

☐ PHONE CALL ☒ DISCUSSION ☐ FIELD TI ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Joel Balmot, Norm Neidergang, Bill Miner, Greg Vanderlaan / Lynn Clark, Jack Burgan (OEPA)

FROM: K. Buttolph

DATE: 1-6-81

TIME: 130 - 330

SUBJECT: Alside, Inc. - Cuyahoga Falls, OH (a subsidiary of US Steel)

SUMMARY OF COMMUNICATION HISTORY:

This case came to my attention via a FOIA request on Oct. 14, 1980. The FOIA request was a result of a 311 demand issued by Dan Papcke on Oct. 7, 1980. This case has also been HMERP'd, but no action was taken because of the ongoing 311. The HMERP file indicates that this site came to Region V's attention ... May, 1980 through Barbara Blum, who had received a complaint from a neighbor of the plant, Mr. Emil Chadima. The HMERP file also contains a letter to C. Grigalauski from OEPA's Chris. Khourey regarding the geology and hydrology of the Alside, Inc. area. This letter is a summary of ground water investigations completed in the area by OEPA. The Oct. 7 311 letter was answered on Dec. 11, 1980 with a letter denying existence of a problem or responsibility ... any potential contamination. A Dec. 10, 1980 inspection by Jack Burgan of OEPA revealed that ① some barrels had been removed and some were awaiting

CONCLUSIONS, ACTION TAKEN OR REQUIRED

removal; ② the company has shut down permanently; ③ Waste currently generated is hauled by SEM to Hardy Road Landfill; ④ the area has been cleaned up - ie. refuse was buried and covered with a layer of dirt. I have also spoken to Mr. Terry Fay of OAG's office. He is currently negotiating a settlement agreement with the company to conclude a lawsuit by the co. against

INFORMATION COPIES TO: GARDEBRING BRYSON FENNER GRIMES/WALKER MINER/

OEPA. Co. sued OEPA for their refusal to issue co. a license OEPA wants groundwater monitoring wells to be required in the agreement. Company so far has refused to put in wells. Papcke's samples of the buried wast area show the presence of trichlorethylene, chloroform, acetone and toluene. Papcke and Lyn Clark feel there is a potential for groundwater contamination based on company's history of burying paint resides and organic chemicals in the area. Emil Chadima has photos of this procedure.

ISSUE: ① Determining appropriate course(s) of action;
② Coordinating any USEPA action with OEPA.

Suggested actions: (a) Follow up on 311 demand if further clean up or information is desired.

(b) Initiate a FIT interim status standards inspection

(c) Issue RCRA Compliance Order for violation of notification requirements (company is a non-notifier); to insure compliance with closure requirements.

(d) Issue §3013 Order to put in monitoring wells

OEPA/OAG: Fay indicated he would file suit this year to get wells put in and some clean up done. He will file even if we issue a RCRA order, or he will intervene if we decide to sue.

CONCLUSION: This site is potentially quite hazardous and deserves close scruting. A large up-front RCRA penalty may also be warranted.

RECORD OF COMMUNICATION ☐ OTHER (SPECIFY)

(Record of item checked above)

TO:	FROM:	DATE
Bittolph	Papcke 393-7260	3-4-81
		TIME 2130

SUBJECT: Alside, Inc.

SUMMARY OF COMMUNICATION

White-stuff in creek (tributary to Mud Brook) over weekend.
Emil got photos & samples.
Gave ½ sample to Papcke. Smells like paint-thinner.
Site looks the same; drums in back yard. Drums contain paint sludge. Drums stacked up on pallets.

Papcke has samples & will keep it until analysis possible.
Spill; not a dumping.
OEPA - Bruce Miller works w/ Jim Irwin. got there - too late to get samples.
Spill noticed by a neighbor who got Chadima who got Papcke. NRC - no response.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Papcke will get copies of Chadima's photos and find out what samples, if any he has of wells.
→ What about an ISS inspection?!

INFORMATION COPIES TO: ~~GARDEARING~~ ~~SKYSON~~ ~~FENNER~~ GRIMES / SCHULTEIS/BUTTOLPH MINER/~~DiPrinzio~~/Balmat

RECORD OF COMMUNICATION

☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Bill Bush OEPA/NEDO

FROM: Joel [illegible]

DATE: 3-2-81

TIME:

SUBJECT: Alside, Inc / Cuyahoga Falls, OH

SUMMARY OF COMMUNICATION

Pursuant to a discussion with [illegible] Clark, I contacted Bill about the contamination [illegible] at Alside. Two distinct areas exist behind Alside's production: 1) lagoons and 2) 55-gallon drum storage.

Lagoons: company built earthen dikes on [illegible] but these did not work [illegible] as [illegible] and they essentially were a direct discharge system to a [illegible] which [illegible] Mud Brook. The company has segregated stormwater from other wastewater and the lagoons are no longer used. The company still has a permitted discharge - OH 0051730 - original permit 2-24-75, expires 2-23-80. [illegible] controlled - CrVI & CN- were only toxics limited.

Alside has been the subject of State Findings & Orders but [illegible] them. Late in 1980 the company changed its [illegible] coating process from chromating & [illegible] successfully ending CrVI discharges.
Bill indicated that recent discharge monitoring shows only low levels of metals & solids.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Mason-Furnace [illegible] ~3 years ago [illegible] Alside on the north. MF also did painting/coating & may have used Alside's lagoons.

A possibility - [illegible] Alside's permit [illegible] MF [illegible]

INFORMATION COPIES TO: File.

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

RECORD OF COMMUNICATION

☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Rick Traub, Groundwater Protection Sec.

FROM: Joel Balmat

DATE 3-2-81

TIME

SUBJECT

Alside, Inc./Cuyahoga Falls, OH

SUMMARY OF COMMUNICATION

I called Rick to check on the Surface Impoundment Assessment of Alside's lagoons.

The SIA shows only 1 lagoon, 19 years old, 2.4 acres.

The allowed pollution standard rating was 25 out of a max of 29; a relatively high rating.

The chemical rating based on materials in the impoundment was 8 out of 9 and listed metal salts as the reason for the rating.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO: File

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Papke

FROM: Buttoph

DATE 12-22-80

TIME 2:00

SUBJECT
Alside, Inc.

SUMMARY OF COMMUNICATION

Papke's threatening 311 asked Alside to (1) identify waste disposal areas at their facility (2) remove drums from the site and (3) prevent contaminated surface water from reaching groundwater. Papke's samples showed chloroform, acetone toluene. Samples taken from soil and swampy area water, behind facility. This area is "field" of dirt with very little grass. Chadima has photos of holes filled with waste which are now covered over/hidden. Papke believes swampy area drains into Wyoga Lake, (to Mud Brook, Cuyahoga River, and Lake Erie).

CONCLUSIONS, ACTION TAKEN OR REQUIRED

(1) See Norm to set RCRA inspection
(2) Either enforce 311 or do RCRA Compliance Order. Preferably the latter with big up-front penalty.
(3) Papke will send over what he has in his file

INFORMATION COPIES

TO: ~~GAMDEBRING BRYSON FENNER~~ GRIMES/WALKER ~~[illegible]~~ MINER/[illegible] File

EPA

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION: V

SITE NUMBER (to be assigned by HQ):

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (*Preliminary Assessment*). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (*EN-335*); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME: ALSIDE, INC

B. STREET (*or other identifier*): 3773 AKRON - CLEVELAND ROAD

C. CITY: CUYAHOGA FALLS

D. STATE: OHIO

E. ZIP CODE: 44223

F. COUNTY NAME: SUMMIT

G. OWNER/OPERATOR (*If known*)

1. NAME: SAME

2. TELEPHONE NUMBER: (216) 929-1811

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4 MUNICIPAL ☑ 5. PRIVATE ☐ 6 UNKNOWN

I. SITE DESCRIPTION

500 DRUMS OF PAINT SLUDGE ON REAR OF PROPERTY

J. HOW IDENTIFIED (*i.e., citizen's complaints, OSHA citations, etc.*)

CONGRESSMAN SEIBERLY?, CITIZEN'S COMPLAINT

K. DATE IDENTIFIED (*mo., day, & yr.*): JUNE 1980

L. PRINCIPAL STATE CONTACT

1. NAME: LYNN CLARK

2. TELEPHONE NUMBER: (216) 425-9171

II. PRELIMINARY ASSESSMENT (*complete this section last*)

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☒ 2. MEDIUM ☐ 3. LOW ☐ 4 NONE ☐ 5 UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED (*no hazard*)

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: _____
b. WILL BE PERFORMED BY: _____

☐ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: 7/21/80
b. WILL BE PERFORMED BY: D. A. PAPCKE

☐ 4. SITE INSPECTION NEEDED (*low priority*)

C. PREPARER INFORMATION

1. NAME: D. A. PAPCKE

2. TELEPHONE NUMBER: (216) 835-5200

3. DATE (*mo., day, & yr.*): 8/25/80

III. SITE INFORMATION

A. SITE STATUS

☒ 1. ACTIVE (*Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.*)

☐ 2. INACTIVE (*Those sites which no longer receive wastes.*)

☐ 3. OTHER (*specify*): _____ (*Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.*)

B. IS GENERATOR ON SITE?

☐ 1. NO ☐ 2. YES (*specify generator's four-digit SIC Code*): _____

C. AREA OF SITE (*in acres*): 4

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE (*deg.-min.-sec.*):

2. LONGITUDE (*deg.-min.-sec.*):

E. ARE THERE BUILDINGS ON THE SITE?

☒ 1. NO ☐ 2. YES (*specify*): _____

Continue On Reverse

Continued From Page 2

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

UNK

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER	X			
8. CONTAMINATION OF SURFACE WATER	X			
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR	X			
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL	X			
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS	X			
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continue On Reverse

Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

'X'	A. TRANSPORTER
	1. RAIL
	2. SHIP
	3. BARGE
	4. TRUCK
	5. PIPELINE
	6. OTHER (specify):

'X'	B. STORER
	1. PILE
	2. SURFACE IMPOUNDMENT
X	3. DRUMS
	4. TANK, ABOVE GROUND
	5. TANK, BELOW GROUND
	6. OTHER (specify):

'X'	C. TREATER
	1. FILTRATION
	2. INCINERATION
	3. VOLUME REDUCTION
	4. RECYCLING/RECOVERY
	5. CHEM./PHYS. TREATMENT
	6. BIOLOGICAL TREATMENT
	7. WASTE OIL REPROCESSING
	8. SOLVENT RECOVERY
	9. OTHER (specify):

'X'	D. DISPOSER
	1. LANDFILL
	2. LANDFARM
	3. OPEN DUMP
	4. SURFACE IMPOUNDMENT
	5. MIDNIGHT DUMPING
	6. INCINERATION
	7. UNDERGROUND INJECTION
	8. OTHER (specify):

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1 UNKNOWN ☐ 2 LIQUID ☐ 3. SOLID ☒ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☒ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4 RADIOACTIVE ☐ 5 HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7 REACTIVE ☐ 8 INERT ☐ 9 FLAMMABLE

☐ 10. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
27,500gal					
X (1) PAINT, PIGMENTS	(1) OILY WASTES	(1) HALOGENATED SOLVENTS	(1) ACIDS	(1) FLYASH	(1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify)		

Continue On Page 3

Continued From Front

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT *(specify)*: _____
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER

☐ 10. OTHER *(specify)*: _____

B. IN COMPLIANCE?

☐ 1. YES ☐ 2. NO ☐ 3. UNKNOWN

4. WITH RESPECT TO *(list regulation name & number)*: _____

VIII. PAST REGULATORY ACTIONS

☐ A. NONE ☐ B. YES *(summarize below)*

IX. INSPECTION ACTIVITY *(past or on-going)*

☐ A. NONE ☒ B. YES *(complete items 1,2,3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION *(mo., day, & yr.)*	3. PERFORMED BY: *(EPA/State)*	4. DESCRIPTION
INSPECTED STORAGE	7/30/80	EPA	TOOK WATER + SOIL SAMPLES

X. REMEDIAL ACTIVITY *(past or on-going)*

☒ A. NONE ☐ B. YES *(complete items 1, 2, 3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION *(mo., day, & yr.)*	3. PERFORMED BY: *(EPA/State)*	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment *(Section II)* information on the first page of this form.

Alside, Inc.
A WHOLLY OWNED SUBSIDIARY OF USS UNITED STATES STEEL CORPORATION

3773 AKRON-CLEVELAND ROAD • MAILING ADDRESS P. O. BOX 2010 • AKRON, OHIO 44309 • PHONE (216) 929-1811 • TELEX 98-6338

December 11, 1980

Mr. Daniel Papcke
On-Scene-Coordinator
United States Environmental
Protection Agency
Eastern District Office
25089 Center Ridge Road
Westlake, Ohio 44156

Re: Inspection of Alside, Inc. Facility

Dear Mr. Papcke:

This will respond to your letter of October 7, 1980 from United States Environmental Protection Agency, Region V, Chicago, Illinois, reporting on results from your inspection on July 30, 1980, of the Alside, Inc. facility in Northampton Township, Ohio. In that letter, you have stated that there exists a "substantial threat of discharge of hazardous substances into Mud Brook" and requested that Alside, Inc. take certain remedial action to eliminate that threat of discharge.

We had no indication or knowledge of any spill or other release of pollutants which could constitute the threat mentioned in your letter. We had then asked Attorney James Allen of Squire, Sanders & Dempsey to obtain further details, and we understand he contacted you on October 14, 1980 to inquire about information you had which could lead to the conclusions set forth in your letter. You explained that the results of sampling you took during the inspection indicated the presence of hazardous organic compounds, and you gave a general indication of the location of collection of those samples.

Since we were not in a position to assess the source or extent of any problem without more detail, on request, information on sampling results and other data was furnished by your office. We have now had an opportunity to review this information and can respond more specifically to your letter, at this time.

At the outset, let us repeat that Alside has had no reason to believe that there exists such a threat of discharge of hazardous substances, and we were surprised to learn that on the basis of limited sampling on your inspection you have reached a conclusion that there does exist such a threat and that Alside causes the threat. We should also note that Alside has made substantial efforts to cooperate with the Ohio Environmental Protection Agency in conforming our activities to the requirements of Ohio and Federal law. Alside intends to continue to cooperate in this manner, although we do not believe that we should be required to undertake activities which are not our responsibility.

Re: Inspection of Alside, Inc. Facility

With respect to the specific sample data, it is difficult to tell where the samples were taken and what sampling methods were used so as to try to substantiate any possible connection between Alside's manufacturing activities and the alleged presence of the organic compounds in the samples. Furthermore, none of the organic compounds identified in your samples have been used by Alside in its manufacturing processes for over 20 years, if at all. We would also like to point out that Alside is not the only discharger which could have contributed to the apparent presence of pollutants in the unnamed tributary to Mud Brook which flows behind its property. There have been and are other industrial users of this stream.

The remedial action which you request includes removal of the drums of waste now stored on Alside's property. Apparently on your inspection, you did not observe any drums to be deteriorated or leaking. Of the drums stored behind Alside's manufacturing plant, a portion are empty and a part contain paint sludges from the manufacturing processes, as has been previously fully disclosed. The drums which contain unreclaimable paint sludge waste are being lawfully stored awaiting final offsite disposal. To the best of our knowledge, all drums are in good condition and are sealed. Alside is actively seeking an acceptable offsite disposal method so that all drums containing waste paint sludges will be removed from the property.

As to other remedial action which you request should be undertaken, Ohio EPA is already aware of waste disposal areas and sites on Alside's property. Furthermore, there are no activities on Alside's property that could be the source of the contaminants identified in your sampling. Finally, Alside has had no indication of any groundwater contamination on its property nor do we have any reason to believe that such contamination exists.

We hope that this has been responsive to your inquiry.

Very truly yours,

L. L. Cochran
Director of Manufacturing
Alside, Inc.

LLC/sf

October 7, 1980

CERTIFIED MAIL

Mr. Larry Cochran
Alside, Inc.
3773 Akron - Cleveland Road
Cuyahoga Falls, Ohio 44223

Dear Mr. Cochran:

On July 30, 1980 the U.S. Environmental Protection Agency conducted an inspection at your facility located at 3773 Akron - Cleveland Road in Northampton Township, Ohio. Soil and water samples were taken and analyzed. As a result of these efforts it has been determined that there is a substantial threat of discharge of hazardous substances into Mud Brook, a tributary of Lake Erie, a navigable waterway of the United States via the Cuyahoga River.

It is the policy of the U.S. Environmental Protection Agency to request the owner or operator of the sites or facility from which there is a threat of discharge to accept the responsibility to abate the threat. If the owner or operator is unable or unwilling to take steps necessary to eliminate the threat of discharge, the U.S. Environmental Protection Agency will initiate such action using Federal authority and funds pursuant to 33 U.S.C. 1321(c)(1). The owner of the site may then be liable for the costs of the remedial actions subject to the liabilities and limitations of 33 U.S.C. 1321(f).

As the Federal On-Scene Coordinator in this instance, I am formally requesting that Alside, Incorporated take steps to eliminate the threat of discharge of hazardous substances into Mud Brook.

The following remedial actions should be undertaken:

1. The drums of waste now stored on the property should be removed and taken to an Ohio EPA approved waste site.

2. All waste disposal areas and contaminated sites must be identified so these threats of pollution can be eliminated.

3. Any contaminated ground water must be prevented from entering surface waters and decontaminated in an environmentally sound way.

hydrologist